

BRADLEY DEAN GRIFFIN

IN THE UNITED STATES DISTRICT COURT

FOR THE WESTERN DISTRICT OF VIRGINIA

CHARLOTTESVILLE DIVISION

ELIZABETH SINES, et al.,

Plaintiffs,

vs.

CASE NO. 3:17-cv-00072-NKM

JASON KESSLER, et al.,

Defendants.

REVISED

REMOTE VIDEOTAPED DEPOSITION

OF

BRADLEY DEAN GRIFFIN

Reported by:

Greta H. Duckett, CCR, RPR, CRR, CVR-S, RVR-M-S

Job no. 180540

BRADLEY DEAN GRIFFIN

Remote videotaped deposition of

BRADLEY DEAN GRIFFIN, taken before Greta H.

Duckett, Certified Court Reporter, Registered

Professional Reporter, Certified Realtime Reporter,

and Commissioner for the State of Alabama at Large,

on Thursday, June 11, 2020, commencing at

approximately 9:45 a.m.

BRADLEY DEAN GRIFFIN

APPEARANCES

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TRADITIONALIST WORKER PARTY:

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ALSO PRESENT:

Julie Ruse

Amanda Liverzani

Lem Lattimer, videographer

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BY MS. MUNLEY

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BRADLEY DEAN GRIFFIN

THE VIDEOGRAPHER: Good morning, Counselors. My name is Lem Lattimer. I'm a legal videographer in association with TSG Reporting. Due to the severity of COVID-19 and following the practice of social distancing, I will not be in the same room with the witness. Instead, I will record this videotaped deposition remotely. The reporter, Greta Duckett, also will not be in the same room and will swear the witness in remotely.

Do all parties stipulate to the validity of this video recording and remote swearing and that it will be admissible in the courtroom as if it had been taken following Rule 30 of the Federal Rules of Civil Procedure and the state's rules where this case is pending?

MS. MUNLEY: Yes.

MR. CAMPBELL: Yes.

MR. KOLENICH: Yes.

MR. JONES: Yes.

BRADLEY DEAN GRIFFIN

THE VIDEOGRAPHER: Thank
you. This is the start of media
labeled number 1 of the video-recorded
deposition of Bradley Dean Griffin, in
the matter of Elizabeth Sines, et al.,
versus Jason Kessler, et al., on June
the 11th, 2020, at approximately
9:46 a.m.

All appearances are noted on the
record. Will the court reporter please
swear the witness in.

BRADLEY DEAN GRIFFIN,
the witness, having first been duly sworn
to speak the truth, the whole truth and nothing but
the truth, testified as follows:

EXAMINATION

BY MS. MUNLEY:

Q. Good morning, Mr. Griffin.

A. Good morning.

Q. My name is Caitlin Munley. I'm from
the firm Cooley, LLP, and I represent the plaintiff
in the action Sines v. Kessler. I'm going to set a
couple ground rules to begin with, and then some of
them are going to be specific to the interesting

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video situation that we find ourselves in today.

So just so that you're aware, a court reporter is transcribing everything that is being said while we are on the record. So I'm going to ask that you speak slowly and clearly so that the court reporter can understand everything that is being said.

Do you understand?

A. I'll do my best.

Q. Okay. It's also important to give verbal responses so the court reporter can record them. Don't shake your head, no nodding, no "uh-huh," "um-hm." We need clear "yeses" or "nos."

Do you understand?

A. Yes.

Q. Okay. I apologize. We may be cutting in or out a little bit. If, at any point, you do not hear my question, please feel free to ask me to repeat it. If you are experiencing any tech issues, let us know as soon as possible.

Do you understand?

A. Yeah, I will.

Q. Okay. If you don't understand a question as I have phrased it, will you let me

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know, and I will do my best to rephrase it in a more understandable way? If you don't tell me that you understand a question [sic], I will assume that you understood it and that your answer is to my question.

Do you understand?

A. Yes.

Q. Okay. There may be objections from counsel here today. As it's clear, there is a couple counsel on the phone. Those objections are for the record only. You are obligated to answer all of my questions regardless of the objection, unless your counsel, Mr. Jones, instructs you not to.

Do you understand that?

A. Yes, I do.

Q. If, at any time, you need a break, please feel free to let me know. As long as there is not a question pending, we can take a break. We discussed this before you got on the line, but I think we're going to break in about 45 minutes for a short break; we'll probably run another 45 minutes after that; and then we'll take lunch. But we're not making you eat super early in the

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2 morning.

3 A. Okay.

4 Q. All right. Do you understand that you
5 are sworn to tell the truth in this deposition
6 today?

7 A. Yes, I do.

8 Q. Are you under the influence of any
9 medication or drugs, including alcohol or
10 prescription medicine, that would impair your
11 ability to testify truthfully and accurately today?

12 A. No.

13 Q. Okay. Is there any other reason you
14 may not be able to testify truthfully or accurately
15 today?

16 A. No. The only problem I anticipate is
17 that my battery on this tablet might go dead, so I
18 might need to --

19 (Simultaneous speakers.)

20 BY MS. MUNLEY:

21 Q. Okay. If that happens, I'll let your
22 counsel know, and we will just reconvene as soon as
23 possible. Okay?

24 A. Okay.

25 Q. I think there is a somewhat high

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likelihood that at least one of us will experience tech issues during this deposition, and so we're going to have to roll with the punches. Okay?

A. Okay.

Q. All right. Have you ever been deposed before?

A. No, I haven't.

Q. Okay. Have you ever been party to a lawsuit before?

A. No.

Q. Have you ever been named as a defendant in a lawsuit before?

A. The other Charlottesville lawsuit.

Q. Do you know the name of that lawsuit?

A. I think it's the Washington lawsuit.

Q. Okay. Is that the same lawsuit that Ms. Tadrint is involved in?

A. I believe so.

Q. And you were not deposed in that matter?

A. No.

Q. Is that matter still pending?

A. I have no idea. It's been going on for two years.

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2 Q. Okay. And you said that the subject
3 matter of that lawsuit is also Charlottesville; is
4 that correct?

5 A. That's correct.

6 Q. Can you give me any more details about
7 that?

8 A. Apparently, this person sued, a few
9 days after Charlottesville, a bunch of defendants,
10 and I was not amongst them. And I believe the
11 lawsuit was withdrawn. And it was reintroduced
12 last May or so, and I was added to it in June. I'm
13 sorry. Not last May. It was May of 2018, and I
14 was added to it in June of 2018. It's been about
15 two years now.

16 Q. Okay. And what are the claims against
17 you in that lawsuit?

18 A. Some kind of conspiracy or something
19 like that.

20 Q. Okay. Have you ever testified in court
21 before?

22 A. No, I have not.

23 Q. Did you do anything to prepare for
24 today's deposition?

25 A. Aside from talking to my lawyer, no.

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2 Q. Okay. Did you review any documents in
3 preparation for this deposition?

4 A. No.

5 Q. Did you speak to anybody about this
6 deposition besides your attorney?

7 A. No, I have not.

8 Q. Okay. How long did you speak to your
9 counsel for?

10 A. About this deposition? Just off and
11 on -- just off and on, telling me I need to get
12 ready to do this and, you know, get Zoom installed.
13 And that's pretty much it.

14 Q. Okay. And you did not go over any
15 documents with your counsel; is that correct?

16 A. That's correct.

17 Q. Okay. Are you familiar with this
18 litigation, the Sines v. Kessler litigation?

19 A. How could I not?

20 Q. Have you -- and, Mr. Griffin, I
21 apologize. I'm going to be asking my co-counsel,
22 Ms. Flamm, to be showing you exhibits. I'm not
23 controlling them myself today, because she's much
24 more tech savvy than I am. So you're going to hear
25 me speaking to somebody called Allegra on the

1 BRADLEY DEAN GRIFFIN

2 record.

3 MS. MUNLEY: Allegra, would you
4 mind showing Exhibit 1?

5 (Exhibit 1 was marked for
6 identification.)

7 BY MS. MUNLEY:

8 Q. Mr. Griffin, do you recognize this
9 document?

10 A. Yes, I've seen it.

11 Q. Okay. All right. So you've seen it
12 before?

13 A. Yes, I'm familiar with it. It's been
14 going on for two years.

15 Q. Okay. Who showed it to you?

16 A. It's been all over the Internet. It's
17 been on the news.

18 Q. Okay. So you saw it on the Internet?

19 A. Well, yes. I mean, everyone, you know,
20 in our circles knows about the lawsuit.

21 Q. Do you remember how you first heard
22 about it?

23 A. I believe it was announced a month or
24 two after Charlottesville.

25 Q. And that was announced in the circle

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2 that you run in; is that correct?

3 A. It was in the media when I first heard
4 about it.

5 Q. So you heard about it on the news; is
6 that correct?

7 A. That's correct.

8 Q. And what is it that you heard about it?

9 A. That Ms. Kaplan (phonetic) has sued a
10 bunch of people who went to the Charlottesville
11 rally and has made various claims of conspiracy.

12 Q. All right. Do you understand that I
13 represent the plaintiffs in this litigation and
14 that you're here to testify as part of this
15 litigation today?

16 A. Yes, I understand that.

17 Q. Okay. Have you spoken to any of the
18 defendants in this litigation about this case?

19 A. Maybe -- maybe briefly. I think that I
20 talked to --

21 (Simultaneous speakers.)

22 A. -- Jason Kessler. I think I talked to
23 Jason Kessler before.

24 Q. Okay. When would that have been?

25 A. I believe he was trying to organize a

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second rally in Charlottesville. And he went to D.C., and he tried to get a bunch of us to come to that. And I didn't want to go to that, because -- one of the reasons being the lawsuits, the violence. I just didn't want to go to his second rally.

Q. Okay. And when he was asking you to go to that rally in D.C., that's when you discussed this litigation; is that correct?

A. You know, it briefly came up. And, you know, he's always talking about, like, his defense against the lawsuit. And I believe he filed his own lawsuit as well, and he informed me of that.

Q. Did you speak to any of the other defendants in this lawsuit about it?

A. Not -- maybe Dr. Hill, I would say. Dr. Michael Hill. I know he's also -- you know, he's also being represented by my attorney.

Q. And what did you talk to Mr. Hill about?

A. Just that, I mean, we have lawsuits to deal with. That's all.

Q. All right. Did you talk to Michael Tubbs about it?

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2 A. Who?

3 Q. Mr. Tubbs.

4 A. I don't believe so.

5 Q. Do you know to whom I'm referring?

6 A. Yes, of course.

7 Q. All right. I'm going to ask you a
8 couple of easy questions here. Have you ever had a
9 different legal name?

10 A. No.

11 Q. Do you have any nicknames or other
12 names that people use to refer to you?

13 A. My pseudonym, Hunter Wallace, my pen
14 name.

15 Q. And is Hunter Wallace the name that you
16 use on the Internet?

17 A. Yes. I have a blog. It's just a name
18 I use for the blog.

19 Q. And what's the name of your blog?

20 A. Occidental Dissent.

21 Q. Do you ever use the name Hunter Wallace
22 in the real world?

23 A. No, not really, although people off the
24 Internet recognize me as the pen name.

25 Q. Is Hunter Wallace the name you use as a

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2 League of the South member?

3 A. No, I use my real name.

4 Q. Okay. Do you have any other names?

5 A. No.

6 Q. Have you ever used any other pen names
7 to write on the Internet?

8 A. Going back 20 years on forums. I mean,
9 various pseudonyms I've used for 20 years on
10 forums. I can't remember them all.

11 Q. Okay. None of them you've used with
12 regularity within the last 20 years?

13 A. Not within the last five, 10 years, no.
14 It's just been Hunter Wallace for 10 years, so --
15 but before that, I used various pseudonyms to post
16 on forums. I'm being completely honest.

17 Q. Do you recall any of them?

18 A. Daedalus was one, but that was posting
19 on a forum ten years ago.

20 Q. And you used that on which forum?

21 A. I believe it was a forum called The
22 Phora. And this was, like, 10 years ago.

23 Q. And what kind of forum was The Phora?
24 What was the subject matter?

25 A. It was the free-speech forum I created

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2 when I was a college student at Auburn University.

3 Q. So this was a forum that you ran; is
4 that correct?

5 A. From 2001 to 2005.

6 Q. Where did you grow up?

7 A. In Barbour County, Alabama.

8 Q. Where do you currently live?

9 A. Barbour County, Alabama.

10 Q. What's the highest level of education
11 that you've received?

12 A. A bachelor's degree from Auburn
13 University.

14 Q. When did you graduate?

15 A. 2005.

16 Q. Are you currently employed?

17 A. I'm self-employed. I run my -- my
18 blog.

19 Q. So your main source of income is your
20 blog; is that correct?

21 A. That's correct.

22 Q. And that's the Occidental Dissent blog;
23 is that correct?

24 A. That's correct.

25 Q. And you receive income from that blog;

1 BRADLEY DEAN GRIFFIN

2 is that correct?

3 A. I mean, readers donate money, yes.

4 Q. But that's your main source of income,
5 is donations from readers; is that correct?

6 A. That's correct. Journalism
7 (indiscernible).

8 (Technical discussion off the
9 record.)

10 A. I consider it a journalism job. It's
11 just a website -- a platform that I own.

12 Q. I'm going to ask you a few questions,
13 and I think we should maybe break and have you call
14 in on your phone, Mr. Griffin, if that's okay.

15 A. Okay.

16 Q. All right. Do you pay other
17 individuals to write articles for your website,
18 Occidental Dissent?

19 A. No, I do not.

20 Q. Do you receive any income from
21 advertising on your website?

22 A. No, I do not.

23 Q. Do you receive any income from League
24 of the South?

25 A. No, I do not.

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2 Q. Do you write for any other websites?

3 A. No, I do not.

4 Q. Have you ever written for altright.com?

5 A. Briefly for a few months in 2017.

6 Q. Have you ever written for Daily

7 Stormer?

8 A. No, I do not. No, I have not.

9 Q. Have you ever written for the League of
10 the South website?

11 A. No, but stuff I've written on my
12 website has been cross-published on other sites.
13 But I don't have access to the League of the South
14 website.

15 Q. Have you ever written for any other
16 website?

17 A. I think I've published an article on
18 VDARE, like, once. Some of my articles have been
19 published on unz.com.

20 Q. Have you ever published any of your
21 articles in print media -- books or newspapers or
22 magazines?

23 A. Some of my articles might have been in
24 The Free Magnolia, which is the League's print
25 magazine, newsletter.

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2 Q. Have you ever written any books?

3 A. No.

4 Q. Have you ever published any journals?

5 A. No.

6 Q. Have you ever run any other blogs
7 besides Occidental Defense?

8 A. Something maybe, like briefly for a
9 month or two, something called Confederate
10 Renaissance. But that's -- it's just basically
11 cross-posted material.

12 Q. Did you ever run a blog called
13 antisemitica?

14 A. Oh, well, yeah, maybe for a month or
15 two, something like that.

16 Q. What was the subject matter of that
17 blog?

18 A. It was just a spinoff of my blog. I
19 mean, it was a way to collect all of the articles I
20 had written about Jews in one place. But it was
21 mainly just cross-posting stuff from my blog all in
22 one place. I write about dozens of topics.

23 Q. I apologize. What was that last word
24 that you said?

25 A. I said I write about dozens of topics.

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2 So the antisemitica blog was basically a topic from
3 my blog that was just cross-posted. It was all on
4 my own website.

5 Q. Do you have any other blogs like that,
6 that are just specific topics?

7 A. No, not anymore. This was an
8 experiment that lasted maybe a few months or two,
9 but it wasn't worth the time.

10 Q. Okay. And you said "not anymore." At
11 one point, did you have other blogs like that?

12 A. Yes. I would -- you know, I would have
13 another blog that -- where I would write just about
14 Jewish issues or one about Southern issues. But
15 that was just not worth the effort of cross-posting
16 material from Occidental Dissent to a separate
17 blog, so I just discontinued it.

18 Q. You had one about Jewish issues and one
19 about Southern issues. Any other blogs that you
20 can think of?

21 A. None that comes to mind.

22 MS. MUNLEY: Okay. All right.

23 Let's go off the record very briefly.

24 I'm going to ask you to call in on your
25 phone.

1 BRADLEY DEAN GRIFFIN

2 THE VIDEOGRAPHER: The time is
3 10:06 a.m. We're off the record.

4 (Recess from 10:06 a.m. to
5 10:21 a.m.)

6 THE VIDEOGRAPHER: The time is
7 10:21 a.m. We're back on the record.

8 BY MS. MUNLEY:

9 Q. Mr. Griffin, you're a member of League
10 of the South; is that correct?

11 A. That's correct. I haven't renewed my
12 dues, though, recently.

13 Q. When was last when you renewed your
14 dues?

15 A. Huh?

16 Q. When was the last time you renewed your
17 dues?

18 A. I think in 2018.

19 Q. Do you understand that the League of
20 the South is a defendant in this lawsuit?

21 A. Yes, I do.

22 Q. How did you first hear about League of
23 the South?

24 A. What did you say?

25 Q. How did you first hear about League of

1 BRADLEY DEAN GRIFFIN

2 the South?

3 A. Oh. Long ago, when I was in college, I
4 think they were defending Confederate monuments in
5 Montgomery. This was 15, 20 years ago.

6 Q. And did you hear about them in the
7 news?

8 A. Yes. Yes. I was in college when I
9 heard about them.

10 Q. Did you hear about them on the
11 Internet?

12 A. Yes. On the news on the Internet.

13 Q. And this was when you were in college.
14 Approximately when was it?

15 A. Probably around 2003-2004 is when I
16 first heard of the group.

17 Q. And at some point, you became
18 personally involved in League of the South; is that
19 correct?

20 A. In 2012.

21 Q. Why did you want to become a member of
22 League of the South?

23 A. The League of the South was a
24 pro-Christian group, a pro-white group, and a
25 pro-Southern group, and it was specifically not a

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2 violent group. I just wanted to associate with
3 other Southerners who share my identity and
4 beliefs.

5 Q. So you decided to become a member of
6 League of the South because you felt like they
7 shared your beliefs; is that correct?

8 A. My identity, specifically.

9 Q. What do you mean by "your identity"?

10 A. Well, I'm a white Southern Christian,
11 and the League of the South is a group for white
12 Southern Christians, so that's why I was interested
13 in the group.

14 Q. Are all white Southern Christians
15 welcome to join League of the South?

16 A. I believe there is other criteria, if
17 I'm not mistaken.

18 (Simultaneous speakers.)

19 A. I mean, they exclude people, like, who
20 are, you know -- like, obviously, like, if someone
21 is an anarchist or something or -- they're not
22 going to just accept any member of the group.
23 They -- people who are -- basically, nationalists
24 is who they accept. But I believe -- but it's been
25 years since I looked at the membership form. I

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believe they have some other criteria on it on their website.

Q. And so, generally, their members need to share their beliefs; is that correct?

A. Yeah. Pretty much. It's an ethnonationalist Southern patriotic group.

Q. You said there's an application form to join League of the South; is that correct?

A. It was on their old Dixie Net website. I believe it's on their new website.

Q. When you became a member, did you fill out that application?

A. Online, yes.

Q. What information did it ask you for?

A. My name, my address. That's just general sign-up information. That's about it. I might have joined at the -- I might have joined at the conference I went to, which was in 2012. I think I actually did an on-site, and I just renewed through the website.

Q. And what conference is that?

A. It was their national conference in 2012.

Q. Okay. And when you joined, did they

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2 ask you any information about your beliefs?

3 A. I was a pretty well-known personality
4 by then, so (indiscernible).

5 Q. Did you have any involvement with
6 recruiting new members?

7 A. I would suppose so. I mean, plenty of
8 people from my blog have joined the group. Plenty
9 of people I've interacted with on Twitter have
10 joined the group -- on social media.

11 Q. So when you are recruiting a new
12 member, what do you do to make sure that they share
13 the beliefs of League of the South?

14 A. I think anyone can join, but, like, if
15 people don't share the beliefs of the group, I
16 think they're kicked out. But, you know, I don't
17 run the group, so I don't know.

18 Q. Do new members undergo any form of
19 vetting process?

20 A. I'm not in charge of that, so you would
21 have to ask Dr. Hill.

22 Q. Are you aware if new members undergo
23 any form of vetting process?

24 A. I think he said anyone could join, if
25 I'm not mistaken. But, I mean, it's up to

1 BRADLEY DEAN GRIFFIN

2 Dr. Hill, who runs the group, to decide whether
3 you're in or you're out.

4 Q. Could a non-white person join League of
5 the South?

6 A. I believe they've had non-white members
7 in the past.

8 Q. Okay.

9 (Simultaneous speakers.)

10 A. A friend of mine is a Hispanic Cuban,
11 so -- I know he's a member. And we have Native
12 American members as well. I know them personally.

13 Q. Could a Jewish person join League of
14 the South?

15 A. I don't know. You would have to ask
16 Dr. Hill. Probably not.

17 Q. Is there anything that a new member
18 needs to do to become a member of League of the
19 South other than submit the application?

20 A. I think there's a -- there's a
21 membership fee and they submit the application.
22 And they're vetted by Dr. Hill, I guess. I'm not
23 in charge of that.

24 Q. Okay. Is there any kind of initiation
25 into the membership?

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2 A. No. There's no initiation ritual or
3 anything like that.

4 Q. Were you recruited to join League of
5 the South?

6 A. A friend of mine from my blog was going
7 to the conference in Wetumpka, which happens to be
8 near where I live. So I went, and I liked what
9 I -- liked what I saw, and that's when I joined the
10 group.

11 Q. Do you recall that friend's name?

12 A. Michael Cushman.

13 Q. And Michael Cushman is a member of
14 League of the South; is that correct?

15 A. Not anymore.

16 Q. When did he stop being a member of
17 League of the South?

18 A. 2015, I believe. He settled down and
19 he got married and had a kid and just returned to
20 private life.

21 Q. Before you joined League of the South,
22 what did you know about the organization?

23 A. I knew it was a pro-Southern group and
24 a pro-Christian group and it was a Southern
25 nationalist group. And I wasn't exactly sure if it

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was a pro-white group, but it eventually became one.

Q. Did you have any involvement in pushing it towards being a pro-white group?

A. Not necessarily. My impression is, when I joined, it was. But I had only seen it then through the media. I didn't know them to that point.

Q. What gave you the impression that it was a pro-white group?

A. Just listening to the speeches. I saw a -- more of an ethnonationalist as opposed to a civic nationalist, similar to the speeches I saw in 2012.

Q. Any specific statements that you recall?

A. No, not really. Just that was my impression, that it was a -- it was a ethnonationalist organization is the impression I got, and I joined it.

Q. What do you mean by "ethnonationalist"?

A. Basically, it's a -- someone who defines their identity in terms of ethnicity, place, history, tradition, like most nations in the

1 BRADLEY DEAN GRIFFIN

2 world.

3 Q. Okay. So an ethnonationalist believes
4 that a society should be made up of only one race;
5 is that correct?

6 A. That's incorrect. An ethnonationalist
7 is someone who believes that identity should be
8 rooted in kinship. For example, Poland is an
9 example of an ethnonationalist country or Hungary
10 or Japan or China. Most of the world's nations, in
11 fact, are based on kinship.

12 Q. What do you mean by "kinship"?

13 A. Blood relation, descent from a common
14 ancestry.

15 Q. So the descendent of a black person who
16 married a white person and had children, that's
17 still a kinship tie that would fit into your
18 ethnonationalism world view; is that correct?

19 A. There's always been mixed-race people
20 in the South. I mean, if a person -- if a white
21 woman, for example, married a black man and had a
22 half-white child, I mean, there would be some
23 degree of biological relation there, obviously.

24 Q. And so that's -- those people would be
25 welcome in the ethnonationalist society that you

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envision; is that correct?

A. I believe there would be a space for those people, yes. In my ethnonationalist vision, people would be allowed to form their own communities. So if, for example, people who are of British ancestry wanted to form their own community, they would be allowed to do so. Or say people who are of Native American ancestry -- or, actually, Native Americans already have their own places. We call them reservations. They're here in Alabama and in most Southern states, and especially in the state of Oklahoma.

So I think people should be allowed to form their own communities, and people who are mixed should be allowed to live like -- I don't think everyone should be required to live the exact same way. I believe that breeds tension and resentment of the sort we've recently seen in this country.

Q. Do you advocate for entirely racially homogenous communities?

A. I think that's an -- I think that's an ideal, that -- not necessarily racially homo- -- race is only one facet of identity. There's also

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1
2 culture and ethnicity and religion. But I believe,
3 generally -- if you want my perspective, which is
4 social conservatism, I believe that homogenous
5 communities where people have -- are united not by
6 ideology but have shared ancestry, history,
7 culture, and values -- I believe those communities
8 are far more stable than diverse communities. I
9 believe in diverse communities, especially under
10 neoliberalism that -- there's a lot of resentment
11 and hate in those communities, which we've seen,
12 for example, explode in places like Minneapolis
13 over the last two weeks.

14 Q. So a community that is all Christian
15 and identifies in all other ways with the same
16 world view but is racially homogenous, does that
17 fit in with your definition of ethnonationalism?

18 A. Of course. I believe religion is a
19 facet of identity, just like ethnicity and culture
20 and race and the family and history -- common
21 history and things.

22 And I think, basically -- if you want
23 my world view, I think that the more homogeneous a
24 society or a community is, the more stable it is,
25 the more it's orderly, the more it's peaceful and

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happy and content. And I believe that, when you combine people of various backgrounds and you exploit them under neoliberal capitalism, that that is just a recipe for social chaos and hatred and discord and disaster of -- for example, like we saw in Richmond, Virginia, last night.

Q. And do you -- is it your understanding that League of the South shares these views with you?

A. Oh. League of the South is definitely rooted in nationalism and social conservatism and identitarianism. That's definitely our -- our world view.

(Simultaneous speakers.)

A. -- be based on ancestry and culture and history and share a strong and common identity, because those -- those societies are far more peaceful and content than the system we have now.

Q. What do you understand that the goals of League of the South are?

A. Obviously, the main goal of the group is Southern independence and also to re-establish society on a more ethnonationalist foundation.

I would emphasize here that

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ethnonationalism is just an ideal, though. We can all have ideals. Like, our society has equality and freedom as an ideal, although reality doesn't necessarily match that ideal. And that's okay. Reality is messy. We don't -- we're not -- we're not ideological fanatics. We are social conservatives.

Q. Okay. And the League of the South, their priority is Southern independence; is that correct?

A. Well, Southern independence, but also more specifically a celebration of Southern culture and, more than anything else -- probably even more than Southern independence is rebuilding Southern ethnic identity and -- because we've lost our identity, I think, over the last 50 or 60 years, and I think that's very sad. So we also --

(Simultaneous speakers.)

BY MS. MUNLEY:

Q. Identity you're referring to, is that the identity of the Confederacy?

A. No. The Confederacy was only four years of our history, although that is part of our history.

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2 Q. Is that identity -- does that identity
3 include the racial regimes that were in place in
4 the South prior to the Confederacy?

5 A. Can you restate the question?

6 Q. Does the Southern identity that League
7 of the South has as their goal include the racial
8 regime that was in place in the South prior to the
9 Confederacy?

10 A. No. No one is proposing to
11 re-establish slavery. That's absurd.

12 Q. What about Jim Crow?

13 A. No, not in my understanding. I believe
14 that people should be -- if they want to form their
15 own homogenous communities, they should be allowed
16 to do so. I mean, American Indians have
17 reservations, but no one is particularly upset
18 about that.

19 MS. MUNLEY: Allegra, would you
20 mind showing exhibit 88 [sic]?

21 (Exhibit 2 was marked for
22 identification.)

23 BY MS. MUNLEY:

24 Q. And I apologize. These are internal
25 reference numbers. This is going to be Exhibit 2.

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2 Mr. Griffin, are you able to see the
3 exhibit? We should have tested this earlier. I
4 apologize.

5 A. Yes.

6 Q. Okay. Do you recognize this?

7 A. Yes.

8 Q. This is from --

9 (Simultaneous speakers.)

10 A. That's my blog.

11 Q. Occidental Dissent. Okay.

12 A. That's from, like, 10 years ago, it
13 looks like.

14 Q. Okay. And you wrote this article; is
15 that correct?

16 A. Should -- it should -- it looks like
17 that way. That's when I was a white nationalist.

18 Q. Are -- you no longer identify as a
19 white nationalist?

20 A. No, I don't. I quit identifying as a
21 white nationalist in 2011. I was a white
22 nationalist before I became a Southern nationalist.

23 Q. I am going to apologize again. This is
24 a little bit slow, but I'm scrolling through this
25 article. And nothing looks out of place; is that

1 BRADLEY DEAN GRIFFIN

2 correct?

3 A. That looks correct. It looks like
4 you're scrolling now, because I see "coronavirus"
5 in the sidebar. So this is obviously not a screen
6 save.

7 Q. Yeah. It's a current screenshot. I
8 believe it was taken very recently. Again, this is
9 moving rather slowly.

10 MS. MUNLEY: Can we go off the
11 record for one moment?

12 THE VIDEOGRAPHER: The time is
13 10:41 a.m. We're off the record.
14 (Off-the-record discussion from
15 10:41 a.m. to 10:44 a.m.)

16 THE VIDEOGRAPHER: The time is
17 10:44 a.m. We're back on the record.

18 BY MS. MUNLEY:

19 Q. All right. Mr. Griffin, can you see
20 the document that I have up on the screen?

21 A. Yes, that's correct.

22 Q. Is this document familiar to you?

23 A. It looks like your -- something from
24 2010.

25 Q. Okay. But this is from your blog; is

1 BRADLEY DEAN GRIFFIN

2 that correct?

3 A. Yes.

4 Q. Excellent. I am going to ask you to
5 read the section starting with, "My favorite."

6 A. My favorite racial regime of the 20th
7 century is the Jim Crow South. I have over a
8 hundred books about the subject on my bookshelf and
9 all sorts of Jim Crow memorabilia. My second and
10 third choices would be the Belgian Congo and
11 apartheid South Africa, which I have written about
12 in the past. If I was forced to pick my favorite
13 racial regime of all time, I would easily choose
14 Confederacy, which was based on the cornerstone of
15 racial inequality, or the White Republic, which
16 lasted from 1789 to 1865. In January --

17 (Simultaneous speakers.)

18 A. Is that enough?

19 Q. Yeah. Thank you. And you wrote those
20 words; is that correct?

21 A. That's correct. I was a white
22 nationalist at the time.

23 Q. Is being a white nationalist different
24 than being pro-white?

25 A. Yes. A white nationalist would base

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1
2 their identity solely on their race. And,
3 initially, when I got involved in the white nat- --
4 the only people who were talking about white
5 identity in the twenty -- in the 2000s, up until,
6 like, 2010, were white nationalists. So I believed
7 that white identity was legitimate, so I became a
8 white nationalist. Although, if you read those
9 articles and in the context of my blog, this was
10 before I joined the League of the South. And my
11 views were -- around 2010, 2011, 2012 were
12 changing. I was becoming more interested in
13 ethnicity and culture, and I was growing -- I wrote
14 a lot of articles around that time where I was
15 growing skeptical of white nationalism. And
16 eventually, I think I wrote a few articles saying I
17 wasn't a white nationalist anymore. So that --

18 Q. I'm going to cut you off there, but
19 thank you.

20 What kind of activities does League of
21 the South engage in?

22 A. They have a blog; they have a
23 newsletter; they do protests. The last thing I was
24 involved with in League of the South that we did is
25 we went down to Panama City to do hurricane relief

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after Hurricane Michael, and we passed out food and groceries and helped hurricane victims in Panama City. So that's the last activity -- the biggest -- last thing, really, I did.

(Simultaneous speakers.)

A. November 2018, I want to say.

Q. Does League of the South hold conferences?

A. Oh, yeah. Conferences too.

Q. Do they hold rallies?

A. Rallies, barbecues.

Q. Do they engage in activism?

A. Activism, yes. Although we've had to change --

(Court reporter interruption.)

BY MS. MUNLEY:

Q. Do they engage in street activism?

A. Yes, they do. They've changed their mode of activism now.

Q. Okay. How so?

A. Well, one thing we learned from 2017 and 2018 is that we had a problem with violent anarchists coming to our rallies to disrupt our events. And after experience with them in

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1
2 Charlottesville and other events, not just the
3 League of the South, but most pro-white
4 organizations, most alt-right organizations decided
5 that they would no longer engage at all with
6 anarchists. So instead of having these
7 pre-announced street rallies, like we did in
8 Charlottesville, there was a shift to doing
9 unannounced rallies, where we would just show up in
10 a place and have a rally. And, that way, we could
11 avoid the violent anarchists who are burning down
12 our country these past two weeks.

13 Q. Does the League of the South publish
14 about their ideas?

15 A. They have their newsletter, The Free
16 Magnolia.

17 Q. And is there -- are you a member of a
18 local Alabama chapter of League of the South?

19 A. There was a local Alabama chapter. I
20 think they parted ways with the League of the
21 South, though. So I'm just -- and I haven't even
22 renewed my own dues, so I'm just supportive of the
23 group at this moment.

24 Q. Okay. Do you know what other states
25 have chapters of the League of the South?

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A. It's changed over the years as people have come and gone. But there's a group in Florida; there is a group in North Carolina; there was a group in Arkansas. I've gone all over the South to League of the South rallies. I've been to, like, 30 or 40 rallies.

(Simultaneous speakers.)

BY MS. MUNLEY:

Q. Was there a group in Tennessee?

A. In Tennessee?

Q. Yes.

A. Yes. I've been to Tennessee several times.

Q. Was there a League of the South chapter in Georgia?

A. Yes, there was. I'm not sure what the status of it is now.

Q. Was there a League of the South chapter in South Carolina?

A. Yes, there was.

Q. Did you ever have a specific role in the Alabama chapter?

A. No. I was just a member.

Q. So did you know anybody who was a

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2 member of League of the South before you joined?

3 A. My friend Michael Cushman was the one
4 who got me into it. He was a member, but he quit
5 around 2015.

6 Q. Okay. Did you know anybody else?

7 A. In the group? No, I didn't know anyone
8 personally in the group at the time.

9 Q. Is Michael Hill in charge of League of
10 the South?

11 A. Michael Hill?

12 Q. Yes.

13 A. Yes. He's still the president of the
14 League of the South.

15 Q. Was he the president of League of the
16 South when you joined?

17 A. Yes, he was.

18 Q. Has he always been the president of
19 League of the South?

20 A. As far as I know. I think so.

21 Q. Can you explain the structure of League
22 of the South?

23 A. It's changed over the years. It was --
24 there was local chapters. There was -- and they
25 reported the state chapters, I believe. And then

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there was the national group.

For a long time, each -- it was a very decentralized thing. And I think, in recent years, they've, you know -- they're just more of a national group than a state or local -- it seemed to be more state and local at the time. Now it's just, like, everyone who is a Southerner, and there's, like, a few guys who are at the top.

Q. So there -- were there leadership roles in the overall League of the South organization?

A. For example, Michael Tubbs is in charge of the Florida chapter. I'm pretty sure he still is.

Q. And did you have a leadership role?

A. No. They just asked me to talk to the media for them, I believe, around the time of the Pikeville rally, and I agreed. And they started calling me the public relations officer. And what I would do is I would talk to the media, and I would promote the -- promote events and interact with people on social media. But that was my -- the only real role I had ever had except for being a member.

Q. Was that a formal position?

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2 A. I think they said it was, but I just
3 consider it I would talk to the media for them.

4 Q. Were you paid for that position?

5 A. No, I was not.

6 Q. When did that start?

7 A. Sometime in 2017, I believe.

8 Q. And --

9 (Simultaneous speakers.)

10 A. I mean, I did a lot of interviews with
11 the press for the group. I talked to various
12 reporters.

13 Q. Are you still the PR officer for League
14 of the South?

15 A. I haven't done any -- I quit talking to
16 the media a long time ago, so I don't -- I guess
17 so, but it's, like, a -- really a defunct role at
18 this point.

19 Q. Who asked you to be the PR officer?

20 A. I believe it was Tubbs or Dr. Hill, one
21 of the two. But they just put me in charge of
22 public relations because they thought I could talk
23 to people and explain our world view. And --

24 (Simultaneous speakers.)

25 ///

1 BRADLEY DEAN GRIFFIN

2 BY MS. MUNLEY:

3 Q. Did they give you direction in your
4 role as a PR officer?

5 A. No, not really. They just said, you
6 know, Brad, he can -- he can talk to people in the
7 media, and we'll let him do interviews and explain
8 what we believe. So they really just left it up to
9 me.

10 Q. So was part of your role as the PR
11 officer -- did that include coordinating with other
12 groups, including other Southern nationalists or
13 white nationalist groups?

14 A. Not really as part of my role, I would
15 say. I just -- I've always known a lot of --
16 I've -- from -- from my time -- like I said, as you
17 cited earlier, I used to be a white nationalist
18 until, like, 2011, so I knew other people from that
19 world. And I had contacts with those people, but
20 that was just mainly personal through my blog. It
21 wasn't any kind of official thing.

22 Q. Do you know what other roles or titles
23 League of the South has?

24 A. There's chief of staff. There's the
25 president. There is, you know, the various state

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chairmen. There was someone who did logistics at one point and operations; he would plan rallies. I can't name them all off the top of my head, but there was just various other roles. And my role was just to talk to the media as the public relations officer.

Q. Okay. Was your role ever described as communications?

A. I would say so, yeah. My -- insofar as I ever had a role in the group besides being a member, I would give speeches at conferences like I did last year, and I would talk to the media. And that's communications, basically.

Q. And did Mr. Hill ever ask you to post about a specific subject?

A. Post about a subject? I don't really think so. I mean, it was probably me posting about it anyway on my own blog, so he probably didn't even have to tell me to post about anything.

Q. Did Mr. Tubbs ever ask you to post about a specific subject?

A. Not that I can recall, except -- well, the only thing I can think of is, at one time, they had some kind of "Get Off Titanic" billboard or

1 BRADLEY DEAN GRIFFIN

2 sticker somewhere, and I think I posted about that
3 once.

4 Q. Did you report about your
5 communications efforts to Mr. Hill or Mr. Tubbs?

6 A. No, not really. They just, you know,
7 let me -- let me handle it.

8 Q. Do you know who Ike Baker is?

9 A. Yes, I know who Ike Baker is.

10 Q. Is Ike Baker a member of League of the
11 South?

12 A. Did the connection drop? I'm back.

13 Okay. Ike Baker was a member of the
14 League of the South. I don't know if he still is.
15 I haven't talked to him recently.

16 Q. Okay. Do you know what his role in
17 League of the South was?

18 A. I believe it was operations, if I'm not
19 mistaken.

20 (Technical discussion off the
21 record.)

22 BY MS. MUNLEY:

23 Q. What does "operations" mean?

24 A. Like, coordinating with police, entry
25 and exit from rallies, and stuff of that nature.

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2 Like logistics --

3 (Simultaneous speakers.)

4 BY MS. MUNLEY:

5 Q. Did he ever hold the title, commander
6 of the Southern Kentucky Defense Force?

7 A. I have no idea. I was never a part of
8 the defense force.

9 Q. But League of the South did have a
10 defense force; is that correct?

11 A. I know that -- I know a lot of them
12 were into training and stuff with firearms and
13 stuff like that. I was never involved with that,
14 and I never went to any of that, so -- I just -- I
15 just know that, like, they do, like -- they
16 practice survival skills and -- and you know, go
17 out on the gun range and do stuff like that, like a
18 lot of people do, but I was never involved in it.

19 Q. You were never part of the logistics
20 and training group?

21 A. No. I was never involved in logistics
22 or defense force or anything like that.

23 MS. MUNLEY: Allegra, would you
24 mind showing tab 67. This will be
25 Exhibit 3.

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2 (Exhibit 3 was marked for
3 identification.)

4 BY MS. MUNLEY:

5 Q. Do you recognize this email?

6 A. It's probably -- it looks like
7 something from VK. And it looks like Pat is
8 inviting me to join a group. I don't -- it looks
9 like -- I don't know if I joined it. I certainly
10 never paid any attention to it. But Pat would
11 often send me stuff like that.

12 Q. Prozium1984@gmail.com is your email
13 address; is that correct?

14 A. That's correct.

15 Q. And what is VK?

16 A. After the League was banned from
17 Facebook, they shifted their operations over to VK.
18 But, in my view, it was a ghost town, so I just
19 kind of rarely went over there, especially in the
20 last two years.

21 Q. So in February 2017, Mr. Hill called
22 for a Southern Defense Force to be formed in the
23 League of the South; is that correct?

24 A. In February of 2017?

25 Q. Yes.

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2 A. Probably. That sounds about right.
3 That's about the time of the Berkeley events.

4 Q. And that offered an opportunity for
5 interested members to increase their proficiency
6 with, quote, hand-to-hand defense skills, firearms
7 training, both pistols and long weapons, and other
8 related skills; is that correct?

9 A. It sounds -- it sounds like something
10 they were doing at the time. This was -- this was
11 an aftermath of the Trump inauguration and it was
12 in the aftermath, I believe, of the Berkeley riots.
13 And so political -- politics was very tense around
14 that period. And I believe they were -- you know,
15 they wanted to --

16 (Simultaneous speakers.)

17 A. But I was never involved in that.

18 Q. And you agreed that there was a need
19 for military preparation, though, correct?

20 A. Well, my impression was that the left
21 was getting far more violent around that period.
22 There was -- I went to the Trump inauguration to
23 see the president inaugurated, and there were
24 massive riots in Washington, D.C., at the time.
25 And then shortly thereafter that, there was all

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these riots at Milo Yiannopoulos' speaking events.

And so, you know, it just seems to me, you know,

self-evident that when --

(Simultaneous speakers.)

MS. MUNLEY: Allegra, will you
show tab number five? And this will be
Exhibit 4.

(Exhibit 4 was marked for
identification.)

BY MS. MUNLEY:

Q. This is another post from your blog; is
that correct?

A. That looks about right. Yeah. Yeah.
That's me and my friend Tom.

Q. All right. I think Allegra is
scrolling to what I want to talk about. It's
number 8 here.

Do you see right here, where it says,
I'm not opposed to preparation. By that, I mean
arming yourself, training, gaining experience with
firearms, developing your military skills with
others.

Is that your position on the League of
the South's development of a Southern Defense

1 BRADLEY DEAN GRIFFIN

2 Force?

3 A. I obviously believe that, you know,
4 there's actually nothing wrong with practicing
5 firearms or getting in better physical shape or
6 working with others, you firing guns at the range.
7 I don't believe, you know, there's anything wrong
8 with that.

9 Q. But you agree that a Southern Defense
10 Force was justified; is that correct?

11 A. Well, when violent anarchists -- from
12 my view -- and this is -- this was around, I
13 believe, February 2017 -- or January. This was at
14 a time when --

15 (Simultaneous speakers.)

16 BY MS. MUNLEY:

17 Q. It's just a yes-or-no question.

18 A. Was it justified? I believe it was
19 absolutely justified.

20 Q. Okay. Thank you.

21 (Simultaneous speakers.)

22 MS. MUNLEY: I think we're going
23 to actually take a quick break. When
24 we come back, I'm going to have maybe,
25 like, 25 minutes of questions, and then

1 BRADLEY DEAN GRIFFIN

2 we'll break for lunch. Does that sound
3 good to everybody?

4 UNIDENTIFIED SPEAKER: Okay.

5 MS. MUNLEY: All right. Let's go
6 off the record. Thank you.

7 THE VIDEOGRAPHER: The time is
8 11:04 a.m. We're off the record.

9 (Recess from 11:04 a.m. to
10 11:13 a.m.)

11 THE VIDEOGRAPHER: The time is
12 11:13. We're back on the record.

13 BY MS. MUNLEY:

14 Q. Do you know Michael Tubbs?

15 A. Yes, I do.

16 Q. Is he a member of League of the South?

17 A. As far as I know.

18 Q. Do you know what his role is in League
19 of the South?

20 A. He was the chairman of the Florida
21 group. I think he might be Dr. Hill's chief of
22 staff now. I'm not up to date.

23 Q. Do you know who Eric Torbolton is?

24 A. Oh. Oh, Eric? Unfortunately.

25 Q. Was he -- is he a member of League of

1 BRADLEY DEAN GRIFFIN

2 the South?

3 A. Not that I know. He was briefly, and
4 then he stormed out and quit. And he's a really
5 weird guy.

6 Q. When was he a member?

7 A. A long time ago. Maybe, like, 2013,
8 2014. I met Eric a few times.

9 Q. Do you know what his role in League of
10 the South was?

11 A. No. As far as I know, he was just a
12 member and one who was very prone to starting
13 conflicts, at that.

14 Q. Do you know Eric Meadows?

15 A. That would be one and the same person.

16 Q. Okay. And we talked about Michael
17 Cushman. Did he have a role in League of the
18 South?

19 A. He was the South Carolina chairman at
20 one point.

21 Q. Do you know Pat Hines?

22 A. Yes. He's the South Carolina chairman.
23 I know Pat.

24 Q. Did he have a role in PR and
25 communications as well?

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2 A. Pat? I don't think so.

3 Q. Did you have any specific
4 responsibilities as the PR officer for League of
5 the South?

6 A. Not that I really -- I think I was sent
7 a handbook. I think they created a handbook last
8 year. I haven't really read through it.

9 (Simultaneous speakers.)

10 A. And I haven't talked to the media
11 anyway, so, like, I don't -- there's not much
12 public relations to do when you're not talking to
13 the media.

14 Q. And you used your blog, Occidental
15 Dissent, to promote League of the South, primarily;
16 is that correct?

17 A. Yes.

18 Q. Do you use any other platforms to
19 promote League of the South?

20 A. At one point, Twitter, mainly.

21 (Simultaneous speakers.)

22 Q. Were you in charge of their Facebook?

23 A. No, I was not in charge of their
24 Facebook.

25 Q. Do you know who was?

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2 A. No, I don't. It's been deleted for
3 years now, as far as I know.

4 Q. Would you say it was generally known in
5 the alt-right alt-south community that you were a
6 member of League of the South?

7 A. Oh, everyone knew I was a member of
8 League of the South.

9 Q. And were you generally viewed as one of
10 the mouthpieces of League of the South?

11 A. A spokesman for the League of the
12 South, yes.

13 Q. Are you familiar with a communications
14 service called Discord?

15 A. Yes.

16 Q. What is Discord?

17 A. My understanding is that it's a gamer
18 platform and some kind of audio software, and it
19 was used by the alt-right in 2017, mainly.

20 Q. And have you used it?

21 A. I was -- yes, I've used it before. I
22 signed up to keep up with updates at the time. But
23 it was mainly, in my view, like an alt-right thing.
24 It was where alt-right people organized, not
25 necessarily our community.

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2 Q. What was the handle that you used on
3 Discord?

4 A. I don't even remember. I just know
5 it's out there. I can't remember.

6 Q. Was that handle Hunter Wallace?

7 A. Probably.

8 Q. How did you first find out about
9 Discord?

10 A. I believe Richard Spencer and Identity
11 Evropa had held the first rally in Charlottesville
12 in May of 2017, correct? And they organized that
13 rally -- Identity Evropa was the main group behind
14 that, and they used Discord. So that's how I found
15 out about it. I'm not a gamer, so -- there's a lot
16 of gamers in the alt-right, and I heard about it
17 from them.

18 Q. Did someone invite you to join Discord
19 or ask you to join Discord?

20 A. I believe so. I believe it was
21 Kessler, if I'm not mistaken. Although --

22 (Simultaneous speakers.)

23 A. Go ahead.

24 Q. Was that for purposes of organizing the
25 Unite the Right?

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1
2 A. The alt-right -- the alt-right groups
3 were using Discord to organize, you know,
4 themselves for Unite the Right, whereas we mainly,
5 you know, chatted -- our groups, which are not
6 really -- the alt-right and Southern nationalism
7 are not really the same thing. So our groups
8 mainly, you know, just chatted through the phone
9 like we usually do. But I got on the Discord to
10 keep up with updates that the alt-right was posting
11 for Unite the Right.

12 Q. And did you use Discord on behalf of
13 League of the South?

14 A. No, not really.

15 Q. So when you posted on Discord, did
16 people believe that was coming from League of the
17 South?

18 A. I don't think so. I was really just
19 speaking for myself and my blog.

20 Q. Have you ever reported to anyone about
21 your Discord communications?

22 A. Have I ever what?

23 Q. Reported to anyone about your Discord
24 communications, like to Michael Hill or anyone else
25 at League of the South?

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2 A. I don't believe so. I barely even
3 checked the thing. I just mainly watched it to
4 find out, like, how to get rides for people who
5 were, you know, sending me messages on Twitter and
6 email.

7 Q. Did you keep using it after Unite the
8 Right?

9 A. For maybe a month or two. And then we
10 noticed that, you know -- that people that
11 Discord -- people on Discord were being doxed so we
12 quit using the platform because it was insecure,
13 although I never really used it to begin with. It
14 was other people who were interested in that.

15 Q. And has the League of the South ever
16 maintained a Discord channel?

17 A. If they have, I don't remember it. I
18 don't think so. I don't think they ever really
19 used Discord much.

20 Q. So you said that League of the South
21 members generally communicate using the phone; is
22 that correct?

23 A. Well, yeah. I mean, most of us have
24 been activists for years, so we know each other in
25 real life. So we would just chat on the phone

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with, you know, friends. Whereas, people in the alt-right are mainly anonymous and didn't know each other in the real world, so they were much more focused on Discord at the time. But we barely -- we were barely using that or even aware of it.

Q. And you said you also used Gab to post on behalf of League of the South; is that correct?

A. Yes. This was mainly after the big shuttering, as we call it, after everyone was banned from Facebook. And my Twitter account was banned in December of 2017 when Twitter changed the rules. And for about a year after that, I posted on Gab in 2018, I believe.

Q. And you -- but prior to that, you used Twitter primarily to communicate on behalf of League of the South; is that correct?

A. In 2017, yes. I had a pretty big Twitter account which I was trying to build up. And like I said, that Twitter account, like Occ Dissent, was banned when they changed the rules in December of 2017.

Q. The Twitter account you were using to communicate on behalf of League of the South, was that Occ Dissent?

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A. It was really just my account, my personal account for my website. But, you know, I would kind of use it interchangeably. I would promote the league on the Occidental Dissent -- occdissent Twitter account, along with just my commentary on my usual subjects.

Q. And just to clarify for the record, the Twitter handle that you were referring to there is @occdissent, correct?

A. That's correct.

Q. All right. I wanted to make sure we got that spelled for our reporter.

Does League of the South use email to communicate with its members?

A. Yes.

(Simultaneous speakers.)

BY MS. MUNLEY:

Q. What email platform does League of the South use?

A. They use, now, ProtonMail.

Q. When did that start?

A. Oh, it was well after Charlottesville. It was probably 2018-2019, I think.

Q. And is that the email address

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2 lspres@ProtonMail.com?

3 A. That sounds familiar.

4 Q. Okay. And is that -- does that send
5 out to a listserv?

6 A. I think so. I've always hated
7 ProtonMail because I just can't juggle, like, so
8 many email addresses, so mainly I stayed in touch
9 with people through my Gmail account. I just --
10 there's too many email addresses for me to keep up
11 with.

12 Q. That's the prozium1984 Gmail account;
13 is that correct?

14 A. That's correct. I mean, that's the one
15 I use for everything, really.

16 Q. Okay. So you receive League of the
17 South emails at that email address, correct?

18 A. Yeah, sometimes, I think.

19 Q. Are you familiar with any other email
20 addresses associated with League of the South?

21 A. Aside from ProtonMail, not really. I
22 think they -- I think before -- before they became
23 more secure, they used Gmail. I'm not sure. But
24 mainly ProtonMail is what they have been doing.

25 Q. So you believe they were using Gmail in

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2 2016 and 2017?

3 A. They were using something. I don't
4 ne- -- know necessarily if it was Gmail. I don't
5 recall. But it was -- I remember we switched to
6 ProtonMail and there was a switch to VK and a
7 switch to Gab, because people were banned from so
8 many other things and, like, the doxings. But that
9 happened well after Charlottesville. I mean, I
10 think people just used their ordinary email
11 addresses before that. I don't think -- I can't
12 recall what it was. But I still --

13 (Simultaneous speakers.)

14 A. I use my Gmail.

15 Q. Do you have a ProtonMail address?

16 A. I think so. Like, I signed up --
17 signed up for one, but I don't think I ever use it.

18 Q. Does League of the South have -- have
19 or had a Twitter account?

20 A. Dr. Hill has been on Twitter many times
21 and has been banned. If they're currently on
22 Twitter, I have no idea what the handle is.

23 Q. Does League of the South use any other
24 social media platforms?

25 A. They were mainly on Facebook until

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everyone was banned from Facebook, and then they went to mainly VK. The VK was a ghost town so, you know, I -- what's the point of going over there and seeing a bunch of people posting in Russian? It seemed like a waste of time to me, so I didn't really use it.

Q. Did you ever utilize any of the League of the South social media accounts?

A. No. I never had access to the League of the South social media accounts.

Q. Did anyone at League of the South ever direct you to communicate via your email or Twitter or Facebook or Occidental Dissent blog on behalf of League of the South?

A. I don't think so. I mean, the only thing that would come to mind is -- I think Mr. Tubbs asked me to post something about his "Get Off Titanic" sticker/billboard. But, I mean, that's, like, the only thing that comes to mind, and that's just, like, ancient history.

Q. Does League of the South have a YouTube channel?

A. I believe they did at one point. It's probably, I'm sh- -- almost gone for sure now.

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2 Q. Do you have a YouTube channel?

3 A. I had one, and I didn't even really use
4 YouTube. I just uploaded my footage from the
5 rally. And YouTube changed its terms of service
6 and deleted my channel. But I have, I think, a
7 channel to watch health and fitness videos and
8 philosophy lectures and history channels and stuff
9 like that.

10 Q. Do you have a podcast?

11 A. Currently? No. I think I might have
12 had -- I might have done a few episodes with Harold
13 when he was doing his Southern nationalist radio
14 podcast, but he doesn't do it anymore.

15 Q. And by Harold, are you referring to
16 Harold Crews?

17 A. That's correct. He did a Southern
18 nationalist radio show, and I would talk to Harold
19 about the events of the day and stuff. That was
20 2017 or 2018.

21 Q. Have you appeared on any other
22 podcasts?

23 A. I've been on -- I talked to Christopher
24 Cantwell a few times right after he got out of
25 prison. I've talked to Mike Enoch on his show

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once, I believe. And I've been on Identity Dixie's Rebel Yell podcast, I think, twice with Kessler maybe -- once or twice with Kessler before Charlottesville.

Q. Does the League of the South have a podcast?

A. That was mainly Harold's show, but he discontinued it.

Q. So my understanding from our discussions is that League of the South members would communicate under their own social media on behalf of League of the South; is that correct?

A. I don't know what you mean by "on behalf of League of the South." People just had the social media accounts, and they would talk about League of the South. But I don't remember ever getting an order from Dr. Hill to, hey, talk about this on your social media. I just don't recall that.

Q. But as the PR officer for League of the South, you used your own social media platforms to promote League of the South, correct?

A. At the time, when I was on Twitter and my -- I used my email address to talk to various

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reporters who wanted to interview me about -- the main thing I recall is that -- being asked to do anything in relation to being a PR officer was to talk to various journalists who had had email inquiries about talking about the League, and I did a few of those.

Q. Did there come a time when League of the South determined that it was necessary to restrict how and what League members were permitted to discuss about the League on social media?

A. I don't really recall that. I recall everyone just being thrown off of social media, basically. And then everyone went over to VK, from what I recall, but VK is a ghost town. So, like, I just hardly ever went over there. I kept Gab while they were doing that.

Q. Did League of the South ever use a Yahoo! group?

A. If they did, this was probably well before my time.

Q. Does the email address lsstaff@yahoogroups.com sound familiar to you?

A. No, it doesn't. It might have been something from the '90s or the early 2000s, but it

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2 was certainly never anything I saw.

3 (Technical discussion off the
4 record.)

5 MS. MUNLEY: I was actually going
6 to ask for a very brief break.

7 THE VIDEOGRAPHER: The time is
8 11:31 a.m. We're off the record.

9 (Off-the-record discussion from
10 11:31 a.m. to 11:38 a.m.)

11 THE VIDEOGRAPHER: The time is
12 11:38 a.m. We're on the record.

13 BY MS. MUNLEY:

14 Q. Mr. Griffin, you said that you haven't
15 been a white nationalist since about 2012; is that
16 correct?

17 A. 2011-2012. I considered myself, for a
18 while there, a Southern nationalist since that
19 time. And now I think I just use
20 nationalist/populist/reaction on my blog.

21 Q. Okay. And you said that League of the
22 South is not a white nationalist group; is that
23 correct?

24 A. It's a Southern nationalist group. And
25 the way I would explain that is a white nationalist

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is someone whose identity is focused on race,
whereas a Southern nationalist is someone whose
identity is grounded in a place, a physical land.

Q. And Mr. Hill is the president of League
of the South; is that correct?

A. That's correct.

Q. So League of the South shares all of
his beliefs; is that correct?

A. Does everyone in the League of the
South agree with Dr. Hill on every issue?
Certainly not.

MS. MUNLEY: Well, okay.

Allegra, will you show -- I believe
it's Exhibit 5.

(Exhibit 5 was marked for
identification.)

BY MS. MUNLEY:

Q. This is from the League of the South
website; is that correct?

A. It looks like it, yeah.

Q. And do you recognize the photos of
Mr. Hill there?

A. Yes, I do.

Q. All right. I'm going to direct you to

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the third paragraph in this, and I'm going to read it. Mr. Hill, on behalf of League of the South, says, we have radicalized by openly and directly addressing the negro and general dark-skin question and the Jew question. We are de facto and openly professed white/Southern nationalists, meaning that we seek to restore the South to the dominance of the white man and to make it our own ethnostate for our posterity.

Is that correct?

A. It looks that way. I can barely see the text.

Q. We can make it larger for you, if that would be helpful.

Is that correct?

A. Yes.

Q. All right. Allegra, will you show exhibit number -- this will be Exhibit 6. It's tab number 93, I believe.

(Exhibit 6 was marked for identification.)

BY MS. MUNLEY:

Q. Is this also from the League of the South website?

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2 A. Yes. It looks like that article is
3 from 2018.

4 Q. And that's a picture of Mr. Hill,
5 correct?

6 A. That's correct.

7 Q. And so that Mr. Hill wrote this
8 article; is that correct?

9 A. That's correct.

10 Q. I'm going to direct you to that first
11 sentence -- two sentences. It says, I am a
12 Southern nationalist. I am a proud white man. I
13 suppose that also makes me a white nationalist.

14 Does that look correct?

15 A. That is correct.

16 Q. Then it goes on to say, So, in reality,
17 I am a Southern/white nationalist, correct?

18 A. That's correct.

19 MS. MUNLEY: Okay. Allegra, will
20 you show what will now be Exhibit 7,
21 and it's tab number 94.

22 (Exhibit 7 was marked for
23 identification.)

24 BY MS. MUNLEY:

25 Q. And, again, this is from the League of

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2 the South website; is that correct?

3 A. Yes, that's correct. This is from
4 2017, I believe.

5 Q. Okay. And based on the date in the
6 corner here, October 30th, 2017?

7 A. Uh-huh.

8 Q. And this is also by Michael Hill?

9 A. That's correct.

10 Q. All right. I am going to direct you to
11 the third paragraph. It says, In Shelbyville, we
12 got our message out. We had a fun and peaceful
13 rally like we had hoped to do in Charlottesville
14 and enjoyed the fellowship of other Southern/white
15 nationalists; is that correct?

16 A. Yes. Can I comment on this?

17 Q. No, thank you.

18 Based on these three documents, do you
19 dispute that League of the South is a white
20 nationalist organization?

21 A. When I joined the League of the South
22 in 2012 --

23 Q. Mr. Griffin, it's a yes-or-no question.

24 A. Dr. Hill has taken it in that direction
25 in recent years.

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2 Q. Okay. Thank you.

3 MS. MUNLEY: Allegra, you can
4 close out of this one.

5 BY MS. MUNLEY:

6 Q. We discussed before and actually just a
7 moment ago, that, in general, League of the South
8 members -- League of the South members share common
9 beliefs; is that correct?

10 A. Like I said, there has been so many
11 changes over the years that it's caused a lot of
12 turmoil within the organization.

13 MS. MUNLEY: Okay. Allegra, will
14 you show what will be Exhibit 8. It's
15 tab 2.

16 (Exhibit 8 was marked for
17 identification.)

18 BY MS. MUNLEY:

19 Q. Do you recognize this document from
20 your blog?

21 A. That looks like from about 2012, yes.

22 MS. MUNLEY: Okay. Allegra,
23 would you mind scrolling up? I just
24 want to verify that date.

25 ///

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2 BY MS. MUNLEY:

3 Q. Close. It looks like it's from 2010;
4 is that correct?

5 A. Oh. 2010. Yeah. Okay. That's even
6 earlier.

7 Q. These are some statements that you're
8 making on League of the South; is that correct?

9 A. This was -- this was about two years
10 before I joined the group, and I had not thought of
11 the group in years when I wrote that.

12 Q. Would you say that a belief that you
13 hold is to not be politically correct?

14 A. Oh. Well, obviously, I mean, I believe
15 in political correctness [sic].

16 Q. And do you believe that that is common
17 to League of the South members?

18 A. Oh, definitely. Everyone in the League
19 of the South rejects this idea that political
20 correctness has anything to do with morality.

21 Q. Okay. And you say that you believe in
22 a white ethnostate?

23 A. I used to be a white nationalist, but
24 I've changed my views on that subject.

25 MS. MUNLEY: Okay. Allegra, will

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you show, I believe it will be
Exhibit 9, tab 85.

(Exhibit 9 was marked for
identification.)

BY MS. MUNLEY:

Q. So in this article, you talk about
believing in a white ethnostate; is that correct?

A. Yes. That was 2010. And it was --
actually, Mr. Harold Covington was one of the
reasons I ceased to be a white nationalist.

Q. Do you believe that -- would you say
that League of the South members are racially
conscious?

A. Oh, definitely.

Q. Would you say that League of the South
members defend white Southerners as a racial and
ethnic group?

A. Oh, well, obviously, they're
ethnonationalists.

Q. Would you say that League of the South
members believe that black people cannot be a part
of Southern nationalism?

A. A lot of them probably do. But from
what I understand, there were black members in the

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2 past, so I'm not exactly sure --

3 (Simultaneous speakers.)

4 BY MS. MUNLEY:

5 Q. Do you believe that black people cannot
6 be part of Southern nationalism?

7 A. I don't see why black people should not
8 be allowed to support Southern nationalism. The
9 world is full of all kinds of people who wish other
10 groups well.

11 Q. Can they be a part of Southern
12 nationalism?

13 A. Well, if we define the South as a place
14 and they're born here and have been here for
15 generations, then, obviously, they can be
16 supportive of Southern nationalism. In fact, many
17 are. One of the rallies I went to with the League
18 of the South, there was a black man named Anthony
19 Hurdey. This is a rally --

20 (Simultaneous speakers.)

21 BY MS. MUNLEY:

22 Q. I'm going to ask you to go back to
23 tab 2. (Indiscernible) for you.

24 If you scroll up, you can see this is
25 the same article we looked at earlier; is that

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2 correct?

3 A. (No response.)

4 Q. We're going to look at this paragraph
5 right here, if you can see where my mouse is. Oh.
6 You probably can't. If you can see where Allegra's
7 mouse is. Yeah. She's highlighting it.

8 A. It's still loading.

9 Q. Oh. I'm sorry.

10 A. Okay. There we go.

11 Q. Okay. You wrote, The idea that blacks
12 can be converted to Southern nationalism is so
13 retarded that it is truly amazing it was ever taken
14 seriously. The most stalwart supporters of the
15 South have always been white racialists. What
16 sense does it make to alienate your base to appease
17 people who will never join you?

18 Is that correct?

19 A. Can you tell me the date on that
20 article?

21 Q. Yeah. Let's scroll up.

22 A. It looks like it was written -- it
23 looks like it was written in 2010, correct?

24 Q. That's correct.

25 A. Well, didn't I tell you I was a white

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2 nationalist at that time?

3 Q. But you don't dispute that you wrote
4 that article, correct?

5 A. I did write it. I was a white
6 nationalist at the time. And as I explained, my
7 views changed over the course of the next few
8 years.

9 Q. And as we've discussed, the League of
10 the South has white nationalist views currently; is
11 that correct?

12 A. The League of the South has become more
13 white nationalist over the last two years. Like --
14 (Court reporter interruption.)

15 BY MS. MUNLEY:

16 Q. And you are still a member of the
17 League of the South?

18 A. I haven't renewed my dues in two years,
19 so I guess not.

20 Q. You're now saying that you are no
21 longer a member of League of the South; is that
22 correct?

23 A. I haven't renewed my dues. I su- --
24 I'm generally supportive of the group. I think
25 it -- I hope it can be turned around. But I've

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never agreed with the -- some of the language that Dr. Hill has been using in recent years about white Southern na- -- Southern/white nationalism. It's been very controversial in the group.

Q. Okay. Your testimony today is that you are no longer a member of the League of the South; is that correct?

A. That would be technically correct. I haven't renewed my dues in two years.

Q. Okay. Whether or not it is technically correct, do you consider yourself a member of the League of the South today?

A. I consider myself just a blogger and a social critic. But I'm not involved in --

(Simultaneous speakers.)

BY MS. MUNLEY:

Q. When I asked at the beginning of this deposition if are you a member of the League of the South and you testified yes, was that incorrect?

A. I was a member of the League of the South. And as I told you at the time, I didn't -- I haven't renewed my dues in two years, so I guess that makes me not a member.

Q. Okay.

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A. From my understanding, membership in the League of the South is based on renewing your dues; and I have not renewed my dues since, I think, 2018.

Q. Is it fair to say that League of the South members do not believe in equality between the races?

A. League of the South members believe that there are natural differences between the races and the sexes and that gender, for example, is rooted in human biology.

Q. They believe that white people are, quote/unquote, biologically gifted and black people are not; is that correct?

A. I believe that different races are gifted in different ways. I would not say that everyone is exactly the same, because it's not true.

Q. Do you believe that white people have contributed more to society and the world than black people; is that correct?

A. If we're looking at accomplishments in, say, science and technology, in math and art, I would say that's unquestionably true.

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2 Q. The League of the South members also
3 believe in creating a society that does not include
4 people of other ethnicities; is that correct?

5 A. I would not say that's correct.

6 MS. MUNLEY: Allegra, will you
7 open tab 56. I think this will be
8 Exhibit 9. I may be off on my number.

9 (Exhibit 10 was marked for
10 identification.)

11 BY MS. MUNLEY:

12 Q. Mr. Griffin, can you see this exhibit?

13 A. Yes.

14 Q. And does this appear to come from the
15 League of the South Facebook?

16 A. What year was this?

17 Q. I actually do not have that on me.

18 A. It appears correct, but I can't tell
19 you what -- place the year. I mean, the rhetoric
20 has changed over the years, as I've told you.

21 Q. Okay. I believe it's 2017, but I will
22 verify that.

23 I am going to read you from this -- and
24 this is from League of the South Facebook, correct?

25 A. It appears that way. I assume it's

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true.

Q. Rather, what we Southern nationalists seek is nothing less than the complete reconquest and restoration of our patrimony, the whole entire South. And that means that the South will once again be, in name and in actuality, white man's land, a place where we and our progeny can enjoy Christian liberty and the fruits of our own labor unhindered by parasitical, quote/unquote, outgroups; to reconquer what is ours, we men of the west -- white men and their women -- must put aside all disagreements and unite in this cause.

Is that correct?

A. It appears that way.

Q. And League of the South members believe in creating a society that does not include Jewish people; is that correct?

A. I haven't seen any official statement on that. But, I mean, ideally, I'm sure they would encourage Jewish people to emigrate.

MS. MUNLEY: Allegra, will you
show tab 46. It's going to be
Exhibit 11.

///

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(Exhibit 11 was marked for
identification.)

BY MS. MUNLEY:

Q. And this appears to be a post that you
made on Twitter; is that correct?

A. I can't see it.

Q. Oh. I'm sorry. It should load in just
a moment.

This appears to be a post that you made
on Twitter in November 2017; is that correct? I'm
sorry. On Gab.

A. One of those two. I see the
occdissent. That's the same on Twitter and Gab.

Q. Okay. And it reads, You will never be,
quote/unquote, mainstream short of these Jews being
overthrown and hurled from power and losing their
ability to set cultural norms. If you think you
are going to sneak up on the Jews, you are fooling
yourself.

Is that correct?

A. That's correct.

Q. And League of the South members believe
that they are prepared to fight for a white
ethnostate; is that correct?

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2 A. Can you clarify the meaning of the word
3 "fight"?

4 Q. Yeah. Absolutely.

5 MS. MUNLEY: Allegra, we're going
6 to go back to, I believe, 10. It is
7 tab 56.

8 BY MS. MUNLEY:

9 Q. We looked at this before. We think
10 it's from the League of the South Facebook page in
11 2017, correct?

12 A. It sounds correct.

13 Q. And the first line is, Fight or die,
14 white man; is that correct?

15 A. That's correct. I asked you to clarify
16 the meaning of the word "fight."

17 Q. In the last paragraph here says, Are
18 you willing to fight for your flesh and blood, for
19 your sublime civilization, or will you meekly and
20 supinely submit to what your enemies tell you is
21 your inevitable and deserved descent into
22 historical and biological oblivion? I choose life
23 and to fight in the tradition of my honorable and
24 courageous forebearers. Join me.

25 Is that correct?

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2 A. That's correct. Can you clarify the
3 meaning of the word "fight"?

4 Q. I am using the word "fight" in the same
5 way that it is used in this post.

6 A. Well, I mean, when you fight for
7 something, that can be -- you can be fighting for a
8 cause. You can be trying to persuade people. You
9 can be publishing literature. You can be
10 recruiting people on social media. Fighting for a
11 cause does not necessarily mean physical violence.

12 Q. And when you're fighting for your life,
13 as this post implies, are you posting on social
14 media?

15 A. Well, you should be trying to convince
16 others that their identity and civilization is at
17 stake. But that doesn't imply that you should be
18 engaging in physical violence, no.

19 MS. MUNLEY: Allegra, will you
20 pull up, I believe it is tab 53. This
21 will be Exhibit 12.

22 (Exhibit 12 was marked for
23 identification.)

24 BY MS. MUNLEY:

25 Q. I'm going to direct you to the last

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paragraph here. It says, Something is wrong with this picture. I have no special talents or insight, but I think if I had the necessary forces and the will and legal authority to use them, that I could stop this crap before it got out of hand. How, you ask? By making the streets of Hamburg run ankle deep with communist blood.

Do you see that?

A. Yes, I see that.

Q. Okay. And this was posted by the Tennessee League of the South and attributed to Michael Hill; is that correct?

A. It looks that way. We've had a big problem recently with anarchists trying to burn down the United States. They recently set the capital of the United States on fire. And if Dr. Hill had the legal authority, I guess, as president of the United States, he could send in the national guard to quell the protest, which is a matter of some concern right now.

Q. And under that definition, what would "fight" mean?

A. Well, it says right there, If I had the necessary forces and the -- and legal authority --

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keyword being there "the legal authority." So what Dr. Hill is saying, if he was in the position of Trump here, he would be using the National Guard to quell all the anarchists who have rioted across our country over the past two weeks.

Q. And he would use that force to, quote, make the streets run ankle deep with blood; is that correct?

A. Well, when people are engaging in violence and breaking the law and, I would say -- and setting police stations on fire and pulling down monuments and physically attacking people and murdering people, as has happened in our country over the last two weeks, someone in legal authority has to respond to that. And like I said, that's a -- a question that's being debated right now. I mean, should the National Guard be used to quell violent anarchists who are assaulting everyday citizens? And I think -- I mean, that is --

(Simultaneous speakers.)

BY MS. MUNLEY:

Q. By doing that, the correct -- the League of the South's position is that the correct response would be to make the streets run ankle

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2 deep with blood, correct?

3 A. Dr. Hill says -- and I quote -- I
4 think -- if I had -- that's a conditional
5 statement. If I had the necessary forces and --
6 another conditional statement -- the will and --
7 key point here, a conditional statement -- legal
8 authority to use them, then I could stop this crap
9 before it got out of hand. Well, I would say --

10 (Simultaneous speakers.)

11 BY MS. MUNLEY:

12 Q. Mr. Griffin, you're not answering my
13 question.

14 A. No. I have answered your question.

15 Q. Okay.

16 (Simultaneous speakers.)

17 A. Huh?

18 Q. What does "blood and soil" mean?

19 A. That means a nation rooted in kinship.

20 Q. And is it a slogan or phrase commonly
21 used by League of the South members?

22 A. Sometimes, yes. What is wrong with
23 saying our country should be based on ancestry?

24 (Simultaneous speakers.)

25 ///

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2 BY MS. MUNLEY:

3 Q. Are you aware that that slogan is
4 derived from the Nazi slogan, Blut und Boden?

5 A. I'm sorry. But most of Europe -- in
6 fact, virtually all of Europe is carved into states
7 that are based on ethnicity, and most of Asia is
8 too. Most of the countries in the world are based
9 on a common ethnicity. And that's --

10 (Simultaneous speakers.)

11 A. No. You're trying to say this is
12 specifically a Nazi position when it's not.

13 Q. That's not the question that I asked
14 you. I asked you whether the slo- -- if you were
15 aware that the slogan was derived from the Nazi
16 slogan Blut und Boden?

17 A. I don't believe it is a -- necessarily
18 a Nazi slogan at all. Japan is based on ethnicity,
19 as well. It's based on -- it's based on blood --
20 citizenship in Japan is based on descent. And the
21 same thing is true in most countries around the
22 world. In Poland. The Nazis invaded Poland, but
23 Poland -- citizenship in Poland is based on
24 ethnicity.

25 (Simultaneous speakers.)

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2 BY MS. MUNLEY:

3 Q. Do members of the League of the South
4 generally believe that Jewish people should be
5 excluded from society?

6 A. From our society? I would say yes.

7 MS. MUNLEY: Allegra, I'm going
8 to ask you to pull up tab 88. This
9 will be Exhibit 13. No. That's not
10 the correct one. I apologize. Give me
11 one moment. Tab 68.

12 (Exhibit 13 was marked for
13 identification.)

14 BY MS. MUNLEY:

15 Q. Mr. Wallace, this appears to be an
16 email from you to -- I believe that's your wife; is
17 that correct?

18 A. No. I printed the email off -- I got
19 my mom to print it off for me.

20 Q. Oh. Okay. I apologize. Your mother.

21 A. It's a speech I gave at the League
22 conference last year, I think.

23 Q. Okay. Perfect. That's all I wanted.
24 I'm sorry. Allegra, you may scroll. Yes. This is
25 perfect.

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You wrote, The story of the late 20th century in America is how Jews became wealthy and powerful and how their disproportionate influence in America's cultural, political, and economic elite set us down the course to where we are at today. Underneath every rock that you turn over that is found to be in the process of either demoralizing or degrading our people and sapping their will to exist, you will invariably find this race of cultural termites.

Is that correct?

A. That's correct. I did say that.

Q. And you've written that you admire Adolf Hitler because he was a supporter of eugenics?

A. That I admire Adolf Hitler?

Q. Yeah.

A. I don't support eugenics.

MS. MUNLEY: Okay. Allegra, will you pull up tab 86. I believe this will be Exhibit 14.

(Exhibit 14 was marked for identification.)

///

1 BRADLEY DEAN GRIFFIN

2 BY MS. MUNLEY:

3 Q. And this is from your blog, correct?

4 A. It looks like it, yes.

5 Q. Okay. And this was written by you in
6 2010, correct?

7 A. It looks like when I was a white
8 nationalist, yes, in 2010.

9 MS. MUNLEY: Allegra, you can
10 scroll down.

11 A. Can you scroll up for a minute?

12 What does that say right there? It
13 says, I'm a white -- it's (indiscernible) --

14 (Simultaneous speakers.)

15 A. It says, I am generally not interested
16 in the Third Reich or European nationalist
17 movement.

18 (Simultaneous speakers.)

19 BY MS. MUNLEY:

20 Q. This is my deposition. You don't get
21 to ask the questions here.

22 MS. MUNLEY: Allegra, will you
23 scroll down?

24 A. Well, you're reading from my post.

25 Q. Yes.

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2 A. I mean, it says right there, I
3 generally am not interested in -- in that. I mean,
4 that's from the same article.

5 MS. MUNLEY: Okay. Allegra, will
6 you highlight the section that starts
7 with "I admire"?

8 BY MS. MUNLEY:

9 Q. It says, I admire Adolf Hitler in the
10 sense that I acknowledge he had a few good points.
11 I'm skipping a sentence here. And it says, He was
12 an artist and a supporter of eugenics, a German
13 patriot, put Germans back to work, prescribed
14 degenerate art, and funded cancer research.

15 It says you admire him because he was a
16 supporter of eugenics; is that correct?

17 A. I did say that at the time. I was a
18 white nationalist. But can I -- can I respond
19 since you're --

20 Q. No, you may not.

21 Do League of the South members --

22 MR. JONES: I'm going to object.
23 He's allowed to -- he's allowed to
24 answer the question.

25 (Simultaneous speakers.)

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2 MS. MUNLEY: But that wasn't the
3 question. And you may --

4 A. Well, I mean --

5 (Simultaneous speakers.)

6 A. You asked me -- you asked me about my
7 opinion on eugenics, so I should be able to respond
8 to that.

9 Q. No. I asked you if that's what that
10 said there.

11 A. Yes, that's what that said there. But,
12 like, I later converted to Chris- -- I later
13 converted to Christianity several years later, and
14 I did not believe in eugenics.

15 Q. My question was whether you wrote that
16 you admire Adolf Hitler because he was a supporter
17 of eugenics. Did you write that?

18 A. I believed in eugenics a decade ago
19 before I was a Christian, but not anymore.

20 Q. That does not answer my questions. Did
21 you write that?

22 A. Yes, I did, a decade ago, before I
23 was --

24 (Simultaneous speakers.)

25 ///

1 BRADLEY DEAN GRIFFIN

2 BY MS. MUNLEY:

3 Q. -- members believe in ethnic cleansing?

4 A. I don't think so.

5 Q. Do you believe in ethnic cleansing?

6 A. I believe communities should be able to
7 have the freedom to form homogeneous communities,
8 and those who want to remain mixed can. I believe
9 that white people should be free to establish white
10 communities; black people should be free to
11 establish black communities. People who want to
12 mix should be able to establish their communities,
13 just like we have Native American communities in
14 this country. And I think, if we did that, that
15 would take a lot of the tension that we have in our
16 society out of it.

17 Q. And you believe that those communities
18 should be free to cleanse their communities of
19 other ethnicities; is that correct?

20 A. I believe those communities should be
21 allowed a degree of sovereignty, like we have on
22 Native American reservations in this country
23 already. There is a --

24 (Simultaneous speakers.)

25 A. -- Cherokee nation. There is an Apache

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nation. Why can't we have -- why can't we extend the same principle to another groups and allow them to have homogeneous areas? Why can't we --

(Simultaneous speakers.)

BY MS. MUNLEY:

Q. And that sovereignty would extend to allowing them to exclude people of other ethnicities or religions; is that correct?

A. Well, I mean, I believe that -- I believe -- Indian nations determine who is a member of their community, do they not?

Q. I'm not being questioned here. I don't have to answer your questions.

A. Well, I mean, you -- when -- you asked me for my views, and I said that different ethnicities should be able to have sovereign areas just like the American Indian reservations. That's my position.

Q. I am asking you if that sovereignty extends to being able to exclude people of other ethnicities or religions from their areas.

A. I don't see why that's a bad thing. I don't believe that all --

(Simultaneous speakers.)

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Q. I'm not asking you what my [sic] judgment is. I'm asking whether that's what you believe.

A. I believe that sovereign areas should be allowed to determine who is a citizen of their community, just like we have on the Cherokee reservations.

MS. MUNLEY: We should break for lunch now, about 45 minutes. We'll come back at 2:00. Does that make sense to everybody? Let's go off the record.

THE VIDEOGRAPHER: The time is 12:15 p.m. We're off the record.

(Lunch recess from 12:15 p.m. to 1:03 p.m.)

THE VIDEOGRAPHER: The time is 1:03 p.m. We're on the record.

BY MS. MUNLEY:

Q. Mr. Griffin, what was the Nationalist Front?

A. It was a group of organizations that came together to -- kind of banded together once the streets started to get extremely violent in

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2017 out of self-defense. I mean, anarchists were getting extremely violent in that period.

Q. And which groups were members of the Nationalist Front?

A. If I remember correctly, it was the League, the NSM, Trad Worker, and Vanguard America, I want to say.

Q. Does NSM stand for National Socialist Movement?

A. Yes.

Q. And TradWorker is Traditionalist Workers Party?

A. That's correct.

Q. And about when was the Nationalist Front formed?

A. If I remember correctly, it was sometime after the Pikeville rally, which was peaceful, and there were no issues in Kentucky.

Q. When was the Pikeville rally?

A. It was in April 2017, I want to say. The end of April.

Q. Who made the decision to form the Nationalist Front?

A. I'm not sure. I wasn't a part of that.

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2 It just happened.

3 Q. Okay. And who made the decision that
4 League of the South would be part of it?

5 A. I'm not sure. Dr. Hill, I guess.

6 Q. Did you agree to join the Nationalist
7 Front?

8 A. I was -- my views were I was skeptical
9 of it, but in the early -- they were affected by
10 what happened in early 2017. When I saw the
11 violence in Berkeley, the violence at the
12 inauguration, the -- you know, it seemed to be
13 everywhere at the time. It seemed like -- I was
14 very concerned -- yeah.

15 When Mr. Spencer was punched at the
16 inauguration, I was very concerned that that was
17 going to escalate and that, once that precedent had
18 been set, that the anarchists would just get out of
19 control. So a lot of groups around that time -- in
20 response to that specific circumstances, groups
21 that had not been allowed in the past kind of
22 banded together at that point; and it was totally
23 because of what was happening with those violent
24 leftists.

25 Q. And so the groups banded together for

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protection; is that correct?

A. Not just -- not just strength in numbers, but we -- I guess the mindset was that authority -- anyone's speech was a threat to the speech of any group, and not just people who were white nationalists or national socialists. But the groups that were engaging in violence, you know, seemed to be denouncing everyone who disagreed with them.

Q. So the groups banded together to present a united front; is that correct?

A. That's correct. We perceived that the left was becoming extremely violent in 2017, and that trend has continued over the last four years.

Q. And you and League of the South felt that you shared enough beliefs with these other groups that it made sense for you to band together against the left; is that correct?

A. I'm not a National Socialist, and I don't agree with National Socialism, but I absolutely supported their right to have peaceful protests. And I was extremely concerned that if this "punch a Nazi" thing -- if that got out of control, then everyone would be being punched and

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that these violent leftists would just overrun us all. And that was my mindset in 2017. So we -- even though we have significant differences with these other groups, we recognize that, you know, all of us are under attack; not just us, but people that don't even, like, share our racial beliefs.

Q. So was the Nationalist Front open to any group that, you know, was interested in practicing free speech?

A. I was not, like, ever in charge of the Nationalist Front, so I don't know.

Q. In your opinion, would it have been open to any group that was interested in practicing free speech?

MR. JONES: I'm going to object.

That calls for speculation. He's answered already.

A. I don't know. That's just (indiscernible).

Q. I'm sorry. I don't think either me or the court reporter caught your last few words there.

A. Oh. I said I wouldn't care to speculate. I was never involved in those decisions

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2 in the first place.

3 Q. Okay. So you didn't know anything
4 about the Nationalist Front; is that your
5 testimony?

6 A. My testimony is that I wasn't involved
7 in the formation of the group. But I recognize the
8 common interests, not just with the members of the
9 Nationalist Front, but also the alt-right groups --
10 NPI, the Proud Boys. All of these groups felt like
11 they were under siege by violent leftists, because
12 it's true. And we all recognized the need to stand
13 up for free speech, because that was very
14 imperative at that moment in time.

15 Q. I'm trying to get to what that common
16 interest is here. I'm not asking you to speculate,
17 because you said that you recognized the common
18 interests. What were the common interests that
19 banded these groups together?

20 A. The right to hold peaceful
21 demonstrations, our right to freedom of assembly,
22 and our right to free speech.

23 Q. So any group that believed in holding
24 peaceful demonstrations, the right to the freedom
25 of assembly, and the right to free speech would

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have fit in with the Nationalist Front; is that your opinion?

A. There were other groups that came to Charlottesville which do not, like, share our racial beliefs at all but, say, supported Confederate monuments, they supported free speech. So there were also Southern heritage groups who came; there were patriot groups and civic nationalist groups. Those organizations had no interest in joining the Nationalist Front, because they didn't believe in, like, ethnonationalism. That's a big dividing line, I would say.

Q. Okay. So the common interest there, in addition to free speech and peaceful demonstrations and the right to assembly, would be ethnonationalism, correct?

A. I would say that's -- I would say ethnonationalism limited the appeal of the Nationalist Front, because you've got to remember there were alt-right organizations like Identity Evropa which never joined the Nationalist Front. But everyone agreed on our importance of free speech and freedom of assembly, which are our constitutional rights.

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Q. So I just want to clarify that -- I'm asking about the four organizations that we identified that are part of the -- were part of the Nationalist Front, what bonded them together, their common interest, was this interest in freedom of assembly and ethnonationalism; is that correct?

A. Freedom of assembly, freedom of speech. And these groups are also united in, I would say, ethnonationalism. Even -- there were even other ethnonationalist groups, like Identity Evropa, which didn't -- was at odds with the Nationalist Front.

Q. Okay. And was Identity Evropa one of the groups involved in the Nationalist Front?

A. No, it was not.

Q. Okay. But, in general, you would say that the groups in the Nationalist Front had a common interest, and that was why they banded together, correct?

A. Yes. We were all under attack by violent anarchist mobs. It seems kind of, you know, the canary in the coal mine now.

Q. So when League of the South joined the Nationalist Front with the National Socialist

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Movement, were you aware that the National Socialist Movement was a neo-Nazi group?

A. I was familiar with that, and for years, for over a decade, I disliked the National Socialist Movement. But when the "punch a Nazi" thing started at Trump's inauguration, I saw where that was going. And I wrote an article, and I said that it's very important to defend their right to freedom of speech, because they're not going to -- in the eyes of these violent anarchists, everyone is a Nazi, even someone's grandmother.

Q. And were you aware, when League of the South joined the Nationalist Front, that the group Vanguard America, who they were banding together with, used the slogan "Blood and Soil"?

A. Yes. Even they have the right to express their views peacefully and to have peaceful demonstrations. Even the National Socialist Movement has been having these demonstrations for 20 years. And even they have the right to do that, and we all acknowledge that. And it was time to stand up against these bullies who were trying to bully everyone into silence.

Q. And were you aware, when League of the

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South joined the Nationalist Front, that Matthew Heimbach, one of the leaders of the Traditionalist Worker Party, had previously joined a -- burned -- joined a cross and swastika lighting hosted by the Aryan Terror Brigade in 2013?

A. Yes. We all made fun of Matt for doing that at the time, but --

(Simultaneous speakers.)

BY MS. MUNLEY:

Q. He was expelled from League of the South for his attendance to that event, correct?

A. Exact -- I'm not exactly sure if it was that specific event, but it was getting involved with those kind of groups. And like I said, these groups had no history of cooperation until, like, the violent anarchists that were at the inauguration and "punch a Nazi" meme went viral after Spencer was attacked at Trump's inauguration in D.C.

Q. Why haven't you previously -- why haven't you and League of the South previously been interested in associating with these groups?

A. Because we have vast ideological and cultural differences with them. I'm a Southerner

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and a populist and a nationalist and a reactionary blogger. I have no interest whatsoever in National Socialism. My ancestry is British. I'm not German (indiscernible).

Q. Had League of the South previously wanted to distance itself from these groups because they were associated with an image that it was not interested in projecting?

A. Oh, that's absolutely true. And it was -- the National- -- the Nationalist Front was highly controversial within the League precisely for that reason.

Q. And what -- what image was that?

A. Well, we don't -- I mean, the vast majority of people in the League do not -- have no interest at all in European neo-fascism or neo-Nazism or anything like that. We're mostly Southerners and Christians. We're interested in the history and future of our own people here in the South. And I'm just, like, not interested in that. Heimbach, for example, was. But like I said, circumstances changed. And the thing that changed was the rise of these violent anarchist groups that we saw happen at Trump's inauguration

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2 and moving forward.

3 Q. And had League of the South previously
4 wanted to distance itself from these groups and
5 their image of violence and street fighting?

6 A. Are you talking about Heimbach's group?

7 Q. All of the other groups in the
8 Nationalist Front -- the Vanguard America --

9 (Simultaneous speakers.)

10 A. Yeah. I don't think they have -- I
11 don't think they ever really had a history -- much
12 of a history of street fighting. Insofar as that
13 ever happened, it was because they were attacked
14 by, you know, violent anarchists who, you know, are
15 in the habit of attacking everybody, including
16 (indiscernible).

17 Q. And what about the violent and racist
18 imagery they have displayed? Did League of the
19 South want to distance itself from that imagery?

20 A. Can you define that?

21 Q. The cross burnings, the swastikas, the
22 Nazi salute, the use of Nazi slogans.

23 A. Yes. That's -- that's not part of our
24 tradition. That's -- like I said, even the most
25 extreme groups have a right to have those rallies.

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And when you start saying, Well, I'm just -- just the Nazis, we'll just punch them, and we can engage in violence against them and take away their constitutional rights, that's a slippery slope. Sooner or later, there are some people will be burning down the capital of the United States.

Q. So League of the South was aware, at the time that it decided to join the Nationalist Front that it was associating itself with an image that it had previously rejected; is that correct?

A. That's correct. There's all kinds of groups that we didn't want to be associated with or disagreed with. But -- and the key "but" is they have a right to engage in peaceful protest as American citizens and --

(Simultaneous speakers.)

BY MS. MUNLEY:

Q. And specifically that imagery is cross-burning, the use of Nazi imagery, and Nazi slogans; is that correct?

A. Yeah. Even those people have a right to do that. And when they don't, a slippery slope is the result.

Q. I know we talked a little bit about an

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event called Unite the Right today. Do you understand that to be the event that occurred in Charlottesville on August 12th, 2017?

A. Yes, I do.

Q. And you're familiar with that event, correct?

A. Yes, I am.

Q. When did you first hear about the Unite the Right rally that was being planned for August 12th?

(Technical discussion off the record.)

BY MS. MUNLEY:

Q. When did you first hear about the Unite the Right rally that was being planned for August 12th?

A. I believe Jason Kessler told me about it either late May or early June that he was getting a permit for it.

Q. When did you decide to attend the rally?

A. I believe I agreed to come in either late May or June. I can't tell you precisely when. But everyone was in a very positive mood after the

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first rally in Charlottesville that was peaceful,
and everyone was in a festive, (indiscernible)
mood, as we would say.

Q. How did you know Jason Kessler?

A. I had only -- I was only vaguely
familiar with him. I had seen -- I think he was
writing for Daily Caller, and I know he was at the
first event. But I barely knew Jason. I think the
first time I actually talked to him was after the
New Orleans rally. But I didn't really know -- I
didn't remember even talking to Jason until, like,
June of that summer.

Q. And I'm sorry. When was the New
Orleans rally?

A. It was in early May of 2017.

Q. When you decided to attend the Unite
the Right rally, was that as an individual or had
the League of the South decided to attend together?

A. Well, I originally decided to attend,
you know, just as an individual. But then a bunch
of other groups signed up, and the League was one
of them. Everyone seemed to have had good time at
the first rally, so everyone wanted to go to the
second one.

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2 Q. Do you know whose idea the second one
3 was?

4 A. It was Jason Kessler's idea.

5 Q. And do you know who was involved in the
6 planning and organization of the event?

7 A. It was planned in different ways, is my
8 understanding. The alt-right groups kind of
9 planned their own thing, and our groups kind of,
10 like, planned our own thing. And we weren't really
11 exactly that in touch, I would -- I would say.
12 But --

13 (Simultaneous speakers.)

14 A. The Nationalist Front groups.

15 Q. So the Nationalist Front groups planned
16 their attendance at the Unite the Right rally
17 together; is that correct?

18 A. I'm not exactly sure. I wasn't part of
19 the planning.

20 Q. You were not involved in the planning
21 at all of the Unite the Right rally?

22 A. Not at all. I promoted it on Twitter
23 and on my blog, but I didn't start organizing
24 anything.

25 Q. Do you know what groups were involved

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2 in the Unite the Right rally?

3 A. If memory serves, it was the four
4 Nationalist Front groups. Identity Evropa was one.
5 There were various smaller groups. Patriot groups
6 agreed to come and protect our constitutional
7 rights. There were flaggers who showed up. I
8 mean, that's my understanding of it.

9 Q. And do you know who the individuals
10 were who were working with Jason Kessler to plan
11 the rally?

12 A. I didn't plan the rally with Kessler,
13 so I don't know.

14 Q. So to kind of restate your testimony
15 here: It was the alt-right, the Southern
16 nationalists, and the white nationalist groups who
17 were working together to plan and attend the rally;
18 is that correct?

19 A. That's not exactly the case. The
20 alt-right groups kind of -- Identity Evropa seemed
21 to have had their own plan, and the League seemed
22 to have had its own plan, and the other groups had
23 their plan. But everyone agreed that they were
24 going to come to Charlottesville and just go to the
25 rally and that Kessler was getting the permits for

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2 it and was handling the court.

3 Q. Do you know who coordinated the
4 speakers and promotional materials?

5 A. I'm not sure who made the memes or
6 anything like that. I just saw them online and
7 shared them. I didn't compile the speakers list or
8 anything like that.

9 Q. And you said you were involved in
10 promoting the rally on behalf of League of the
11 South; is that correct?

12 A. Well, I promoted it on my own behalf
13 and, I guess, on the part of the League. I
14 promoted it almost overwhelmingly on my Twitter
15 account and on my blog.

16 Q. And we talked before about how your
17 Twitter account and your blog were what you used to
18 promote League beliefs and League events; is that
19 correct?

20 A. Well, yes, I used any own accounts to
21 promote League stuff. But, I mean, that -- I had
22 already decided to go before the League had even
23 got involved, I mean, as an individual. I liked --
24 I was impressed by how the first rally went, and it
25 seemed like everyone had a good time. And everyone

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wanted to have a good time that summer and have a big, you know, euphoric rally, kind of like a end-of-the-summer, I don't know, like, Woodstock kind of thing: go to a rally and have an afterparty afterwards is what I understood.

Q. Did anybody ask you to help with the promotion of the rally?

A. I don't recall exactly, but, you know, I promoted it anyway, so it didn't matter.

Q. Did you ever talk to Jason Kessler or Eli Mosley about the promotion of the rally?

A. I think I talked to Kessler. We did an interview on the Identity Dixie Rebel Yell podcast together.

Q. And did he ask you to do any other promotion?

A. I don't really recall. I was promoting it anyway. I thought it was a good idea.

Q. Did Michael Hill ask you to promote the Unite the Right rally?

A. I don't recall. I was promoting it anyway, so. . .

Q. He was speaking at the rally; is that correct?

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A. Yes. He was listed as one of the speakers by Jason. I'm not sure what he -- interactions he had with Jason. You would have to ask him.

Q. Did you generally promote Michael Hill's speaking engagements as the PR officer of League of the South?

A. Well, there hasn't been that many since Charlottesville. There was the Shelbyville rally, and there was a few flash rallies after that. But I wasn't involved, really, in the flash rallies. I covered it afterwards in the aftermath.

Q. All right. But prior to the Charlottesville rally, did you generally promote Michael Hill's speaking engagements?

A. I would say I promoted the other rallies, like the Pikeville rally and the -- what was it? -- the New Orleans one. Those were the two I remember from that time period.

Q. So you promoted other events where League of the South planned to attend --

(Simultaneous speakers.)

A. I mean, yeah. I mean, before 2017, we had had something like 20 or 30 rallies across the

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2 South and never had any problem with any of those
3 whatsoever. And that was --

4 (Simultaneous speakers.)

5 BY MS. MUNLEY:

6 Q. And you promoted all of those on your
7 website and your personal social media accounts; is
8 that correct?

9 A. Yeah. The ones back in 2013, '14, '15,
10 '16, from the -- the first rally I promoted was in
11 Uvalda, Georgia, through, I think, Shelbyville. I
12 don't recall promoting the ones after that, because
13 they were mainly flash rallies, so you didn't want
14 to promote an event and give advance notice that
15 you were doing something. So I covered them -- I
16 posted pics and stuff from the rallies afterwards.

17 Q. And when was the Shelbyville rally?

18 A. It was two months after
19 Charlottesville. I think in October of 2017.

20 Q. Okay. Through 2017, you were still
21 very much engaged as the PR officer and working
22 with Michael Hill to promote League of the South
23 and Michael Hill events, correct?

24 A. I promoted our rallies, because I agree
25 with the message, from -- like, 2013 was the first

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one, through Shelbyville. And after that, we changed tactics, and we did flash rallies, so we didn't have advance notice. We would just show up somewhere. And that way, we could avoid the violent anarchists and not have to deal with those people, which was --

(Simultaneous speakers.)

BY MS. MUNLEY:

Q. You were PR officer for League of the South in 2017; is that correct?

A. I believe that's when they kind of gave me that role. But, I mean, I was already -- unofficially for years, you know, I would promote the rallies before that.

Q. And who gave you that role?

A. I'm not sure if it was Tubbs or Hill. I can't recall. One of the two.

Q. And they asked you to promote League events; is that correct?

A. I was going to do it anyway, so yeah. I mean, I promoted -- oh. I forgot about the conferences too. I've gone to all the national conferences since 2012.

Q. So you promoted these events at the

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direction of and request of Michael Hill. Whether or not you were going to do it on your own, he had asked you to do it, though, correct?

A. I don't think -- I don't recall ever, you know, him asking me. I was just doing it anyway. I mean, I was a big supporter of activism --

(Simultaneous speakers.)

A. I was a big supporter of the activism, and I agreed with it at the time. And I changed my views in 2018 about that.

Q. So he appointed you as the PR officer but did not ask you to actually do any PR for League of the South; is that your testimony?

A. I had very, very, very vague interactions with him. I mean, it was just like, okay, Brad -- Brad is going to promote what we do anyway because Brad is a supporter of the League. So, I mean, he didn't really have to tell me to promote events. I would do it anyway, because I agree with the League. And like I said, I quit supporting these public street rallies in 2018.

Q. So right now, I think we're going to focus on 2017. I'm not really interested in the

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time period after Charlottesville. I will have questions about that after this. But let's focus on the time period leading up to and including the Unite the Right rally in August of 2017. Okay?

A. Okay.

Q. Do you know if anybody else in League of the South was involved in the planning of the Unite the Right rally?

A. I think Ike, maybe.

Q. Is that Ike Baker?

A. Yes. I mean, I wasn't in charge of planning the rally itself. I had nothing to do with that.

Q. Was Michael Tubbs involved in the planning?

A. I'm not exactly sure. I don't really recall talking about it. My job was just to -- if we talked to the press, would be to talk to the press, and to promote the rally on social media, which, you know, I guess I did. I was doing it anyway.

Q. And was Michael Hill involved in the planning?

A. I don't think Hill personally was. I

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don't think he plotted the logistics of, like, entering the rally and leaving the rally, who got the -- who reserved where we stayed at in Charlottesville. I don't think he handled those decisions. But, like I said, I want to emphasize I don't know. You would have to ask him.

Q. And League of the South had a venue for their members to stay at while they were at the rally; is that correct?

A. Yes.

Q. Where was that venue?

A. It was north of Charlottesville, I believe, in Madison, Virginia.

Q. And was it just a large house outside of Charlottesville?

A. It was, like, a -- some kind of new-age hippie retreat campground. It was very weird. It was -- it was north -- a bit north of town, though.

Q. Sounds right for Virginia. Do you know who organized the compound?

A. No, I don't. I was just told that's where to meet up, and I drove up there with my friends and just stayed there in the home.

Q. Okay. So you stayed there, correct?

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2 A. Yes. I spent the night at that place.

3 (Simultaneous speakers.)

4 BY MS. MUNLEY:

5 Q. How many other League of the South
6 members stayed there?

7 A. Probably 50 to 60, I'd say.

8 Q. Did Michael Tubbs stay there?

9 A. I believe so.

10 Q. Did Ike Baker stay there?

11 A. I'm pretty sure he did.

12 Q. Did Michael Hill stay there?

13 A. Yes, he did.

14 Q. Is there anyone else you recall from
15 League of the South who stayed there?

16 A. Just various people who went to rallies
17 at the time.

18 Q. Any specific names you can recall?

19 A. Let me think. I don't really -- I just
20 know names like Spencer and things, like -- I think
21 Harold -- yeah, Harold was there.

22 (Simultaneous speakers.)

23 BY MS. MUNLEY:

24 Q. Did Tyler Davis stay there?

25 A. I'm not sure.

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2 Q. Tyler Davis?

3 A. I believe he stayed there.

4 Q. Okay. Did anybody from other groups
5 stay at the League of the South venue?

6 A. I'm pretty sure that that was not the
7 case.

8 Q. So nobody that you recall from groups
9 besides League of the South, correct?

10 A. I didn't see anyone there who wasn't,
11 like, involved with the League.

12 Q. So we've talked about you promoting the
13 Unite the Right rally, and you said that you
14 retweeted and reshared the memes and the posters
15 that other people put together; is that correct?

16 A. That's correct. I have no skill at
17 graphic design. None.

18 MS. MUNLEY: Allegra, let's show
19 tab 57. I believe it's Exhibit 15.

20 (Exhibit 15 was marked for
21 identification.)

22 BY MS. MUNLEY:

23 Q. Mr. Griffin, let me know when you can
24 see that.

25 A. Oh, I can see it.

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2 Q. Okay. Does this poster look familiar?

3 A. Yes. It was one of the many poster
4 memes of the event that was circulating at the
5 time.

6 Q. And is this one of the ones that you
7 shared?

8 A. I'm pretty sure. There was a lot of
9 cool memes like that that I shared.

10 Q. Are these birds on the poster?

11 A. I have no idea. I didn't design that.
12 I'm -- I don't know, like, what that was on there
13 for.

14 Q. Have you ever seen this symbol before?

15 A. I'm not sure what it is. It's
16 definitely not anything to do with the South.

17 Q. And I apologize. Anything to do with
18 what?

19 A. The South. It's not -- it's not
20 Southern iconography, is what I would say.

21 Q. So this poster was not created by
22 League of the South, correct?

23 A. Oh, no. Definitely not.

24 Q. However, you promoted this poster as a
25 member of the League of the South, correct?

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2 A. I shared it on Twitter, just because I
3 thought -- and I think Facebook and maybe on my own
4 blog, because I thought it was cool.

5 Q. And Michael Hill is listed as a speaker
6 on this poster; correct?

7 A. That's correct.

8 Q. Are you aware that the birds on this
9 poster are eagle symbols used by the Nazis?

10 A. I don't know. It's not a detail I
11 noticed at the time or thought much about.

12 Q. And are you aware that these birds are
13 carrying a fasces?

14 A. No. I didn't -- like I said, I didn't
15 really dwell on it at the time. It just looked
16 like an alt-right meme -- memer. You see it looks
17 like Pepes with Confederate flags and lojacks.
18 Some alt-right person did this.

19 Q. So on the bottom here, it looks like
20 there are soldiers with firearms marching; is that
21 correct?

22 A. It looks like the Confederate army,
23 made up of Pepes and lojack memes. It's just
24 something some alt-right kid made.

25 Q. So you tweeted or shared on Facebook or

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on your blog a -- promotional material for the
Unite the Right rally with Nazi and fascism and
Confederate signs and with firearms to advertise
the rally; is that correct?

A. It's just a -- it struck me as just,
like, a poster some kid made that looked cool, to
be honest. I didn't dwell -- I didn't dwell on the
eagles or the fasces or anything. I didn't even
notice it at the time.

Q. Did you notice the soldiers with
firearms?

A. Yeah. It's Pepes and lojacks. So, I
mean, this is just Internet meme culture here.

Q. So it didn't occur to you at the time
that the inclusion of these symbols -- the Nazi
imagery and the firearms -- would promote an image
of violence; is that correct?

A. No, it never once occurred to me,
looking at this poster, that it had anything to do
with violence. I mean, I look at the poster, and I
see monuments, I see Confederate flags, eagles,
names listed. I see Pepes and lojacks. So, I
mean, this is just, like, something an Internet kid
made, an alt-right kid made and posted on 4chan or

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2 something.

3 (Simultaneous speakers.)

4 MS. MUNLEY: Tab 65 will be

5 Exhibit 16.

6 (Exhibit 16 was marked for

7 identification.)

8 BY MS. MUNLEY:

9 Q. Mr. Griffin, does this look familiar to
10 you?

11 A. Yes. That's another meme that someone
12 created.

13 Q. This is not a League of the South meme;
14 is that correct?

15 A. No. The League of the South never made
16 any of these memes. It was just various people on
17 Twitter were making them and sharing them.

18 Q. Okay. And you were sharing them,
19 correct?

20 A. That's correct. I thought they were
21 cool memes.

22 Q. In your position as PR officer for
23 League of the South, correct?

24 A. No. I was just sharing them because I
25 thought they were cool memes.

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Q. So it's your testimony that you were not promoting the Unite the Right rally on behalf of League of the South; is that correct?

A. It just didn't occur to me at the time. I was promoting the rally anyway. I didn't, like, make this distinction. I just was sharing what I thought was a cool meme, and I was promoting the rally. It didn't really matter --

(Simultaneous speakers.)

BY MS. MUNLEY:

Q. You didn't really draw a distinction between what you shared and promoted as an individual and shared and promoted as PR officer for League of the South; is that your testimony?

A. That's correct. Just -- I just shared on my social media account what I thought were cool memes.

Q. And this meme says, "Join or die"; is that correct?

A. Yes. It's a reference to the American Revolution.

Q. Were these posters intended to cause fear among non-white people and Jewish people?

A. It seems unfathomable to me that

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someone would be afraid of a meme that has, what, Czechostan in it. Like, it never -- it never occurred -- it never once crossed my mind that this is, like, something, like, fearsome at all.

(Simultaneous speakers.)

BY MS. MUNLEY:

Q. -- something that says "Join or die" might inspire fear?

A. It's a reference to American history.

Q. And it's --

(Simultaneous speakers.)

BY MS. MUNLEY:

Q. It's unfathomable to you that something that includes Nazi imagery might inspire fear; is that your testimony?

A. If you look at the tail of the snake, it says K, and that's a reference to Czechostan, which is an Internet meme and a joke. I don't understand how anyone -- I guess people who aren't familiar with Internet meme culture. But, like, I look at this and I'm like, okay, Czechostan. I mean, come on here. This is a joke. All it is is saying that people are coming together to support a rally.

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2 MS. MUNLEY: Allegra, will you
3 put up Exhibit 15 again, tab 57.

4 BY MS. MUNLEY:

5 Q. And is it your testimony that it is
6 unfathomable to you that something that displays
7 Nazi imagery would inspire fear in Jewish people?

8 A. It never occurred to me at the time.
9 Like I said, I didn't dwell on the eagles or
10 anything. I just saw like, what, Pepes and lojacks
11 and Confederate flags and monuments. And it
12 says -- you know, it's a speaking event. I mean,
13 it has a list of speakers. This is for a rally.
14 It just didn't cross -- honest to God, it just
15 never crossed my mind. And like I said, I never
16 even dwelt on, like, the eagles thing. I never
17 even noticed it until you brought it up a second
18 ago.

19 Q. And is it your testimony that it is
20 unfathomable to you that a poster that shows
21 soldiers marching with firearms would inspire fear
22 in people?

23 A. Well, I mean, some people are
24 illiterate and they don't understand Internet meme
25 culture. And I see Pepes and lojacks. And this is

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just Internet meme culture. I don't understand, like -- I can't -- I can't gra- -- I can't process what other people are feeling. I can't reach into their minds. But it certainly wasn't on my mind.

Q. You anticipated violence at the Unite the Right rally; is that correct?

A. I anticipated that it would go a lot like -- there was a Klan rally after the first rally, a public rally in Charlottesville. And my anticipation was -- is that we would go there and we would hold the rally, like the Klan groups held their rally in, I think, July, the previous rally. And I anticipated that the anarchists would spend their time fighting with the police. That was my expectation. I ex- -- I trusted the police based on what I saw at the July rally.

Q. Did members of the League of the South plan to bring shields to the Unite the Right rally?

A. That is the case. We were afraid that projectiles would be thrown in the park after watching what happened at the July rally, and that turned out to be very accurate.

Q. And did they plan to use these shields as weapons?

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A. No, not at all. The only thing we anticipated is that projectiles would be thrown into the park. We believed, based on what happened at the July rally, that the police would succeed in maintaining law and order. And certainly, with two, three months to prepare and the whole federal government and the state sending in -- there was more than enough cops there to maintain law and order, in our view.

Q. And you communicated, actually, with the Charlottesville police on behalf of League of the South regarding security for the event; is that correct?

A. I was contacted by a Sgt. Via, I think, of the Charlottesville Police Department.

Q. And you told them -- him what the League of the South plans were; is that correct?

A. As far as -- he asked me, like, how many people were coming and what our intentions were. And I believe I talked to the sergeant on the phone. And I fully cooperated with the police. I told them --

(Simultaneous speakers.)

///

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2 BY MS. MUNLEY:

3 Q. He was asking you these questions, not
4 as an individual attending, but as a representative
5 of the League of the South; is that correct?

6 A. He contacted me via email, I guess,
7 because he was -- the Charlottesville Police
8 Department was searching for information about the
9 event and my blog was promoting it, so he reached
10 out to me, and I talked to him.

11 (Simultaneous speakers.)

12 BY MS. MUNLEY:

13 Q. Did you expect that groups like Black
14 Lives Matter and Stand Up For Racial Justice would
15 show up at the Unite the Right rally?

16 A. I did anticipate that antifa, Black
17 Lives Matter -- I expected a bunch of protesters,
18 but I expected it to go just like the July rally
19 which I had saw.

20 MS. MUNLEY: It's going to be
21 Exhibit 17. Allegra, will you show tab
22 10?

23 (Exhibit 17 was marked for
24 identification.)

25 MS. MUNLEY: Can we go off the

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2 record for just a moment.

3 THE VIDEOGRAPHER: The time is

4 1:49 p.m. We're off the record.

5 (Off-the-record discussion from

6 1:49 p.m. to 1:50 p.m.)

7 THE VIDEOGRAPHER: The time is

8 1:50 p.m. We're on the record.

9 BY MS. MUNLEY:

10 Q. We're going to show Exhibit 17.

11 Mr. Griffin, does this exhibit look familiar to
12 you?

13 A. Yes. It's a post I wrote on my blog.

14 Q. Okay. And this was on August 4th,
15 2017, correct?

16 A. That's correct.

17 Q. You wrote, It is reasonable to assume
18 there is a high potential for civil unrest. There
19 hasn't been a far-right event this large in the
20 United States in over 25 years. And by the end of
21 the day, the antifa and SJWs could be very, very,
22 very triggered. Someone has to protect the public.

23 Is that correct?

24 A. That's correct.

25 Q. The League of the South that had to

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protect the public?

A. No. That's the job of law enforcement.

Q. But eight days before the event, you believed there would be civil unrest; is that correct?

A. Based on what I saw at the July rally, anarchists got violent and attacked the cops and there were a bunch of arrests. And in the aftermath of that rally, they took over Charlottesville City Hall and chased the mayor out and were just going crazy on several occasions in Charlottesville City Hall. So my assumption was that we would go and have the rally, it would be like the July rally, and then the anarchists would probably just take out their rage by attacking the police, as is their custom.

Q. So did the League of the South do anything to prepare for this unrest that you anticipated?

A. We trusted completely that the police would maintain order at the event, and we based that assumption based on the first two events that were relatively peaceful in Charlottesville.

(Simultaneous speakers.)

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A. -- had like two months to -- the federal and state government and the local government had two months to prepare for the rally. Our understanding was that it was going to be a sea of police there. And if they had made the slightest effort, they would have been able to keep order.

MS. MUNLEY: Allegra, will you show tab 13?

(Exhibit 18 was marked for identification.)

BY MS. MUNLEY:

Q. This will be Exhibit 18. Do you recognize this document?

A. That's correct. I wrote that on my blog.

Q. Okay. And you wrote this on August 31st, 2017; is that correct?

A. That sounds about right.

Q. Allegra is going to scroll for us.

You wrote, We brought about a dozen shields. They were designed to deal with any projectiles that we expected antifa to lob into the park, and a few of us brought pepper spray. But as

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a whole, no one came in with sticks or any type of weapon; is that correct?

A. There was a debate before the rally whether we should bring guns or anything, and the debate was whether that has bad optics. And from what I know, we agreed that, as a group, we wouldn't come in armed, but individuals might, you know, come armed to protect (indiscernible); but as a group, not. So we were relatively more disarmed than usual at that rally. And like I said -- I said what I just told you. We brought shields because we anticipated that projectiles would be thrown into the park. But we trusted the police with our security, and that trust was misplaced.

Q. But people brought pepper spray; is that correct?

A. I believe some people did, yes.

Q. And you said that some people brought other weapons; is that correct?

A. I don't know. I can't speak for them. I didn't --

(Simultaneous speakers.)

BY MS. MUNLEY:

Q. You just said that some individuals

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brought weapons, but, as a group, you decided not to?

A. The policy was -- from what I remember, is that the group would not come armed to the rally, especially with guns. But I believe Dr. Hill said that individuals, you know, could bring means to defend themselves. But that -- my impression was that we were coming in significantly less armed than is our usual custom, because that was bad optics. That was the debate: whether it was bad optics to come in with guns. And most people didn't come in with guns, although I can't -- I have no idea what each individual brought, because there was no group policy on that that I recall.

Q. And are you aware if people brought weapons to defend themselves?

A. You would have to take that up with them. I came in completely unarmed. I didn't even have goggles on. And I came with my wife, and we were both unarmed. I didn't even have goggles on or anything to defend myself except a selfie stick, because I was anticipating that the day was going to be a nice day in the park. I never would have

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brought my wife into a violent situation like that if that was what I anticipated would happen.

Q. Did League of the South have a uniform that their members were told to wear to Unite the Right?

A. As per our custom at events, we usually wear the black khakis and the League polo shirt, and I believe that's what I was wearing that day.

Q. And did League of the South send a document to its members in advance of the rally detailing this uniform?

A. I believe that had been set in policy, the khakis and the black polos, for a while before the rally. So that was just normal.

Q. And the League of the South members planned to enter and exit the park in military formation; is that correct?

A. I wasn't -- I wasn't aware of the planning details. Like I said, my job was there just to cover the rally by filming it and to talk to the media. I didn't handle that. I didn't know. All I knew was I was going with the group.

Q. And who gave you that job?

A. Are you talking about public relations

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officer? We've already been over -- we've already been over that.

Q. You keep saying that nobody gave you that job, but then you keep talking about how you were given the job.

A. Well, we've already established that, you know, I was given, I guess, the role of being public relations officer. I never took it seriously, because I had been promoting the rallies and stuff for years before I had that title. So I just did what I normally do. And, like, my -- I was -- my impression was I was going to film the event and talk to the media. I had nothing to do with the planning and logistics of the entry and exit. The only thing -- the only exception being when Sgt. Via asked me about how many people were coming, and I told him the honest truth.

Q. Mr. Griffin, the issue that we're having is that you keep detailing assignments that you were given and then saying, oh, nobody gave me that assignment, it was just going to do something -- something I was going to do anyway. Do you understand?

A. You keep, like -- you keep making this,

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1
2 like, I had this -- I was doing this as part of a
3 role. But like as we covered earlier, I was
4 already promoting the League events for years
5 before 2017. I was already filming the events. I
6 was already -- I was -- as I told you, I was going
7 to go to the rally regardless if the League went.
8 So, I mean, I didn't have it in my mind that I was
9 doing this on behalf of the League. I was -- I
10 guess, for myself and both. I was just promoting
11 the rally and talking to journalists like I always
12 do. And I talked to the police when they contacted
13 me, but I didn't reach out to them. And I
14 certainly didn't plan the logistics of the entry
15 and exit.

16 Q. You testified, quote, my job there was
17 just to cover the rally by filming it and to talk
18 to the media, end quote.

19 So your testimony is that you gave
20 yourself that job; is that correct?

21 A. Like I said, I've always -- before --
22 before I was the public relations officer for the
23 League, I would talk to the media, and I would
24 promote the events. And I was doing this before
25 they said that you have this title, public

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relations officer. I believe they gave me that title after the Pikeville rally when I talked to the media on behalf of the League, just because I was there. And I didn't have a role then, but I did it anyway.

And that's what I planned to do in Charlottesville, which was in -- in Pikeville, I talked to journalists, and I also did the same thing in Shelbyville. So, I mean, does it matter? I mean, I was talking to the media anyway. I don't think it really matters. It's, like, a distinction without a difference, in my view.

Q. So League of the South planned to march in military formation and wear a uniform to the Unite the Right rally; is that correct?

A. I didn't know anything whatsoever about the plan to enter and exit the park until I got there. I didn't plan that aspect of the thing. I had nothing to do with it. I just followed along with my wife.

Q. So once you got there, though, you learned that League of the South members planned to march together in military formation into and out of the park; is that correct?

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1
2 A. When I got there, everyone was lining
3 up so they could go in together, because we wanted
4 to go in together, because that was the safest way,
5 because, as per is the custom of anarchists -- it
6 is their custom to attack the lone individual,
7 which is exactly and precisely what they did in
8 Charlottesville. They beat the crap out of people
9 who tried to come into the rally alone. And it
10 just was common sense to go in together as a group.

11 It was -- I didn't know anything about
12 military formation. It was just common sense and
13 given -- in light of the threat. And
14 specifically -- the League parked specifically
15 right besides the Charlottesville Police Department
16 at the Market Street parking garage. My
17 understanding was we were cooperating with the
18 police, and we literally, like, trusted our
19 security to them and parked right next door to the
20 police department. So I didn't anticipate any
21 problems going in or out of the park.

22 Q. So League of the South planned to exit
23 and enter the park together wearing the same
24 uniform; is that correct?

25 A. We always -- we always wear our -- our

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shirts and our -- our khakis and stuff, just because it -- you know, it looks nice, to, you know, be in khakis and stuff. And we've always -- we've done that for, like, four years. But our custom has always been to cooperate with the police and trust our security to law enforcement.

Q. I'm not asking you about the police, Mr. Griffin. I understand. I understand that that is your position.

I'm asking you about the plan for the event and how you were planning -- how League of the South was planning to exit and enter the park. They were planning to do so in a large group wearing the same uniform; is that correct?

A. I did not -- I did not -- I wasn't aware -- like I said, I wasn't aware of any plan.

(Simultaneous speakers.)

BY MS. MUNLEY:

Q. -- that when you got there?

A. Right. I just lined up behind everyone else, and we walked into the park.

Q. You arrived in Charlottesville on Friday afternoon; is that correct?

A. That's correct.

1 BRADLEY DEAN GRIFFIN

2 Q. And you drove there from Alabama?

3 A. Let me see. I was kind of worried for
4 a second there about battery on my tablet. Yes.
5 We -- I drove from -- we drove from Alabama to
6 Charlottesville, yes.

7 Q. Who did you drive with?

8 A. My wife and four friends.

9 Q. Who were those friends?

10 A. Andrew, Ryan, Michael, and Chris.

11 Q. What was Andrew's last name?

12 A. Andrew Tracey was one of my friends,
13 Ryan King was another, Michael Weaver was another,
14 and I don't know Chris's real name. He's just a
15 local in Alabama.

16 MS. MUNLEY: Let's actually go
17 off the record. We'll take a break and
18 let Mr. Griffin recharge his tablet for
19 a few minutes. We'll come back at 3:20
20 Eastern time. Does that make sense?

21 THE WITNESS: Okay. All
22 right. So it's 2:20 my time?

23 MS. MUNLEY: Correct.

24 THE VIDEOGRAPHER: The time is
25 2:05 p.m. We're off the record.

BRADLEY DEAN GRIFFIN

(Off-the-record discussion from
2:05 p.m. to 2:23 p.m.)

THE VIDEOGRAPHER: The time is
2:23 p.m. We're on the record.

BY MS. MUNLEY:

Q. So you arrived in Charlottesville on
Friday afternoon; is that correct?

A. Yes. Yes.

Q. And you participated in the torchlight
rally on Friday night?

A. Yes.

Q. You attended that as an observer for
League of the South; is that correct?

A. No.

Q. Did you attend that with other League
of the South members?

A. There were a few people there as
individuals, but group had decided to stay behind
that night.

Q. So how many of you from League of the
South attended?

A. I'm not sure. I just know with me, it
was just the people who were in -- who came with me
to Charlottesville.

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2 Q. And how many people was that?

3 A. Me, my wife, and four friends.

4 Q. So at least six people and potentially
5 more people from League of the South attended,
6 correct?

7 A. Well, I think two -- two of them, I
8 don't think, were League of the South members.
9 Maybe three, anyway.

10 Q. You-all came from the League of the
11 South venue together; is that correct?

12 A. No. We had gone to a barbecue at
13 another friend's house -- another friend's place.
14 And I had talked to Jason Kessler, because I found
15 out that evening that the -- the antifa had found
16 out about the torchlight march, and I recommended
17 to Jason that he shift the location of that march.
18 But he called me back and said that he had talked
19 to the police and everything was fine and good to
20 go. And it was around that time that the court
21 ruled in our favor that he had won his lawsuit and
22 he could have the rally in the park the next day.

23 Q. But why did you recommend to
24 Mr. Kessler to cancel the torch march?

25 A. Because I was concerned about antifa.

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And Jason assured me that he had talked to the police and the police said everything was fine and that they were going to protect everything.

Q. Why were you concerned about antifa on Friday night but not on Saturday?

A. I was concerned about them -- about them both nights. But the torch march was going to be a surprise thing. But Jason told me that, you know, he had talked to the police about it beforehand, and the police were going to be providing security, you know, for both days.

Q. Why was the torch march planned as a surprise?

A. Because there was -- it was like the first one.

Q. What do you mean by "it was like the first one"?

A. The first event in May was, like, a surprise event.

Q. The first event in Charlottesville?

A. The time they went in there with May -- when Identity Evropa had a torch march at the monument in May, that was not publicly advertised.

Q. And why was it not publicly advertised

1 BRADLEY DEAN GRIFFIN

2 in May?

3 A. To deter antifa from coming, to avoid
4 conflict.

5 Q. Did you see Jason Kessler at the torch
6 march?

7 A. I briefly ran into him afterwards.

8 Q. Did you see Richard Spencer?

9 A. No.

10 Q. Did you see Christopher Cantwell?

11 A. Yes.

12 Q. Did you see James Fields?

13 A. No.

14 Q. Did you see Andrew England?

15 A. No.

16 Q. Did you see Robert Azzmador Ray?

17 A. Yes.

18 Q. Did you see Nathan?

19 A. No.

20 Q. Did you see Eli Mosely?

21 A. Not sure. It was really chaotic. I
22 don't think so.

23 Q. Did you see Matthew Heimbach?

24 A. No. He wasn't there.

25 Q. Did you see Matthew Parrott?

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2 A. No.

3 Q. Did you see Michael Tubbs?

4 A. No.

5 Q. Did you see Michael Hill?

6 A. No.

7 Q. Thank you see Jack Schoep?

8 A. No.

9 Q. Did you see Augustus Sol Invictus?

10 A. Yes.

11 Q. What did you bring with you to the
12 torch march?

13 A. We had some torches, but we were late
14 getting there. It was halfway over. And some of
15 my friends had torches who came with me, but I
16 didn't have one.

17 Q. Where did you get the torches from?

18 A. I think a Dollar General.

19 Q. On the way to the torch march?

20 A. I believe we already had them.

21 Q. So you brought them from Alabama?

22 A. I believe so.

23 Q. And why did you bring a torch?

24 A. We knew that there was going to be a
25 torch march and the alt-right was doing that; but

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we weren't sure whether we would get there in time or whether we would go, so we just brought one just in case.

Q. And did everybody bring tiki torches to the march?

A. In my group, no.

Q. Did the other protestors -- or other people at the march have tiki torches?

A. Yes.

Q. And were they giving them out to people who didn't have them?

A. Were they what?

Q. Were they giving tiki torches out to people who did not arrive with them?

A. I didn't see them doing that. I arrived late.

Q. And what was the purpose of the tiki torches?

A. It's an American custom, and it was to honor the memory of our forefathers, especially Thomas Jefferson, who is the champion of free speech.

Q. What do you mean by "it's an American custom"?

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2 A. Torch marches were commonplace in the
3 19th century.

4 Q. What were they -- what were they used
5 for?

6 A. Both political parties had torch
7 marches all the time in the 19th century. The
8 Republican party had -- and the Democratic party
9 both had -- commonly had torch marches in the -- in
10 the 18th and 19th centuries.

11 Q. And they just held torch marches for no
12 reason?

13 A. There was always political -- like I
14 said, political torch marches. It was -- it would
15 be elections. It was -- I mean, it's commonplace
16 in Europe today, but it was also extremely
17 commonplace in 19th century America.

18 Q. Did you light your own tiki torch?

19 A. What?

20 Q. Light your own tiki torch?

21 A. I didn't have a lit tiki torch.

22 Q. But other people who were with you did?

23 A. I think two of my friends did. But it
24 was already halfway over there -- it was already
25 halfway over when we arrived, so what was the

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2 point, in my view. I caught up to the back of the
3 line.

4 Q. So you did not carry a torch; is that
5 correct?

6 A. No. My wife did, I believe.

7 Q. Did everybody in your group bring the
8 lighter fluid for their tiki torches?

9 A. I'm not exactly sure. I wasn't the one
10 who bought them, and I didn't light it.

11 Q. What did you wear to the torch march?

12 A. I believe I bought a new polo from my
13 friend Kyle at the barbecue. It was a -- it was a
14 new League of the South polo. I got it from him
15 just a moment before.

16 Q. What color was it?

17 A. It was a black one, I think.

18 Q. And were other people wearing black
19 polos?

20 A. Not really. It was an all-white event.

21 Q. Was there an instruction given to wear
22 a white polo?

23 A. If there was, I didn't notice. It was
24 really Identity Evropa that did that. That was
25 their group.

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2 Q. But everybody else was wearing a white
3 polo; is that correct?

4 A. No. They were too many people there.
5 They were just dressed in all kinds of street
6 clothes, and everyone wasn't in a white polo,
7 although I think Identity Evropa members might have
8 been. I'm not sure.

9 Q. If this was an Identity Evropa event,
10 why did you decide to attend?

11 A. It was -- my understanding is that
12 there was going to be three events that weekend:
13 the surprise torch march, the rally, and an
14 afterparty. And it was really, like I said, on a
15 spur-of-the-moment thing, after Kessler assured me
16 that he had talked to the cops and the cops had
17 told him that the police were going to protect the
18 rally, that I went. But I wasn't inclined to go
19 before then.

20 Q. Your testimony is that you packed a
21 tiki torch when you left Alabama, but it was not
22 your intention to go to the torch rally; is that
23 correct?

24 A. It was an optional thing. Like I said,
25 I didn't really decide until the last minute to go.

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But we didn't even think we were going to get there in time for it. And we were extremely tired when we got there, because we drove all night. We thought about sleeping, just going to sleep that evening.

Q. Did you bring a weapon to the torch march?

A. No, I did not.

Q. Did anybody you were with?

A. No.

Q. Did you see anybody at the torch march carrying weapons?

A. No.

Q. Did you see anybody carrying firearms?

A. No, I did not.

Q. Was anybody carrying shields?

A. I don't recall shields at the torch march.

Q. Did you see anybody carrying knives?

A. No.

Q. Did you see anybody carrying batons?

A. No.

Q. Did you see anybody carrying pepper spray?

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2 A. No, although I remember when it was
3 discharged.

4 Q. Did you see people carrying lighter
5 fluid?

6 A. No. When I got -- when I arrived
7 there, the march was halfway over. It was already
8 underway, so they had lit their torches before I
9 got there.

10 Q. You said that the intent of the march
11 was to walk to the Jefferson statue on the
12 University of Virginia campus; is that correct?

13 A. That was my understanding. It was to
14 honor Thomas Jefferson, who is one of the founding
15 fathers and champion of the First Amendment, and to
16 show that we support our heritage and especially to
17 emphasize that the -- it wasn't just the
18 Confederate monuments that would be attacked, it
19 would be all monuments, which was accurate.

20 Q. So from Nameless Field, the torch march
21 went -- walked to the Jefferson statue, is that
22 correct?

23 A. It was already halfway over in the UVA
24 campus when I arrived. They were already marching
25 through the campus. I arrived there, and I didn't

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2 even -- I didn't even bother to light a torch,
3 because it was already halfway over. And so I just
4 caught up at the back of the line.

5 Q. Though the march was walking through
6 the campus and up the lawn, correct?

7 A. I'm not familiar with the grounds, but
8 it marched through the campus, is what I saw.

9 Q. Were the marchers at the torch rally
10 chanting anything?

11 A. I believe so.

12 Q. Were they chanting, "You will not
13 replace us"?

14 A. That was Identity Evropa. I think
15 that's their slogan.

16 Q. What did you take this to mean?

17 A. It means that, you know -- that they're
18 going to stand up and defend their culture and
19 identity and the monuments from people who are
20 destroying monuments.

21 (Simultaneous speakers.)

22 BY MS. MUNLEY:

23 Q. I apologize. Could you repeat that?

24 A. I said that they were opposing the
25 people who were engaged in violence and tearing

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down monuments, like in Richmond last night.

Q. Does it refer to non-white people replacing white people?

A. I think they were referring -- I think it's more than that. I think it's a total destruction and erasure of identity, and it isn't so much about non-whites as it is destroying our culture and identity, is my understanding.

Q. And did you chant, "You will not replace us" with the torch rally?

A. I don't recall chanting anything. I'm not a chanter.

Q. Did the marchers chant, "Jews will not replace us"?

A. I believe some of them did.

Q. Does this refer to Jewish people replacing white people?

A. It refers to Jewish people attacking Southern monuments, American -- monuments to American history. There's a long thread on Twitter today about someone -- a self-identified Jewish person who has a hit list of all kinds of monuments which need to be destroyed. So that's the kind of people they were responding to.

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2 Q. Did the marchers chant, "Blood and
3 Soil"?

4 A. Some of them did.

5 Q. Were these statements intended to be
6 intimidating to non-white people?

7 A. I don't think so. Most nations in the
8 world are based on ethnicity, not citizenship.

9 Q. So your testimony is that a large mass
10 of people carrying torches, chanting "You will not
11 replace us" is not -- was not intended to be
12 intimidating to non-white people; is that correct?

13 A. Torch marches are common in Europe and
14 are common in American history.

15 Q. (Indiscernible.)

16 A. I did not see it as intimidating. I
17 thought it was a celebration of our identity.

18 Q. Were these statements intended to be
19 intimidating to Jewish people?

20 A. I don't think so.

21 Q. All right. Did the marchers also
22 chant, "Into the oven"?

23 A. I didn't hear that one.

24 Q. So is it your testimony that a large
25 mass of people carrying torches, chanting "Jews

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will not replace us" is not intended to be
intimidating to Jewish people?

A. I would say that they're just opposed
to Jewish people who are tearing down our
monuments, like in Richmond last night.

Q. Did you get close to the Jefferson
statue?

A. I was -- I got around it, but I was
towards the back.

Q. Did you see people around the Jefferson
statue locking arms?

A. Yes, I did. I was somewhat surprised
the police weren't there.

Q. And how many people were -- had their
arms locked around the Jefferson statue?

A. I couldn't really see. I was at the
back.

MS. MUNLEY: Allegra, will you
show tab 13? I think we used it as an
exhibit before. I don't recall which
number it was.

BY MS. MUNLEY:

Q. Do you recognize this document?

A. Yes, I do.

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2 Q. I think we identified it before. It's
3 a post that you wrote on your blog, Occidental
4 Dissent, correct?

5 A. That's correct.

6 Q. Okay. And you wrote on this blog that,
7 When we came down the stairs at the Jefferson
8 monument, Emily Gorcenski was there with a group of
9 about 20 antifa; is that correct?

10 A. That's correct. After the event was
11 over, I got to -- a month to review the footage,
12 but it was different from being in the moment.

13 Q. So there were about 20
14 counterprotestors there, correct?

15 A. After reviewing the footage after the
16 event, there were -- I think, there were about that
17 many.

18 Q. All right.

19 A. But I couldn't see at the time -- from
20 my perspective at the time, being actually involved
21 in the event, I didn't see it at the time. I -- it
22 was only, you know, looking through the video
23 footage after the event, because people are a lot
24 taller than me, so I couldn't see over them.

25 Q. I can certainly relate. And then --

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and that's also because you noted that there were a huge mass of people attending the torch rally, correct?

A. I was shocked by how many people were there.

Q. And, eventually, the people at the torch rally surrounded the protesters at the statue; is that correct?

A. Yes. There wasn't any police at the statue when we arrived.

Q. Not the question that I asked you.

The marchers surrounded --

A. Yes.

Q. Got you. Okay. Were you part of that group that surrounded the protesters?

A. No. I just stood back and watched.

Q. What was the purpose of surrounding the protesters, in your opinion?

A. In my view, the protesters were, you know, supposed to be separated by police, but they were there disrupting the event. And the plan -- I think the plan was to just surround the -- to go forward with the event and to -- I think that was always part of the event -- was just to go to the

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statue. I mean, I thought that was the goal. But the police were supposed to separate the protesters, and they didn't.

Q. Was the purpose of surrounding the protesters to intimidate them?

A. No. I think that the goal was to surround the statue regardless. I think that was -- I don't think they counted on the protesters being there.

Kessler had talked to the cops, and the cops had told Kessler that they were going to separate the protesters, and they did not.

Q. Was the purpose of surrounding the protesters to provoke a violent confrontation?

A. That's inconsistent with talking to the cops beforehand.

Q. Is that a "no"?

A. That's a "no."

Q. Did you interact with any of the protesters?

A. I briefly met Jason at the event. I shook his hand, but I don't think I said more than three words to him.

Q. Did you interact with any of the

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2 protesters who were locking arms around the statue?

3 A. No, I did not.

4 Q. Did you feel threatened by the
5 protesters who were locking arms around the statue?

6 A. I saw one of them barrel through the
7 ring of people at me, and it was a commotion, and
8 it was over in, like, a split second. But I just
9 kind of, like, stood back. I was kind of surprised
10 that the police weren't there, to be honest.

11 Q. And so did you feel threatened?

12 A. Not from my distance from the -- from
13 the statue, no.

14 (Simultaneous speakers.)

15 A. I did inhale the pepper spray, though.
16 That was my first experience with that.

17 Q. Did you see anyone confront the
18 protesters who were surrounding the statue?

19 A. There were too many people in front of
20 me. I couldn't see from my vantage point.

21 Q. Did you see anyone throw lighter fluid
22 on the protesters?

23 A. No, I did not. Like I said, the people
24 in front of me were a lot taller than me, so I
25 couldn't see over them or what was going on. I

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2 just saw one barrel through, and the next thing I
3 know, it was over.

4 Q. So, in your opinion, was the torchlight
5 rally a success?

6 A. It was disrupted. Everybody was, you
7 know -- I don't think people read into the
8 significance of what happened that night at the
9 time. But people were feeling positive about it.
10 But, like I said, I didn't -- I was too far away to
11 see what happened right at the -- you know, right
12 around meeting at the statue. I was behind a lot
13 of other guys. I just saw it.

14 Q. What do you mean by "the significance
15 of what happened"?

16 A. The significance of the -- in
17 hindsight -- hindsight is 20/20. But Kessler had
18 told me that the cops were going to be there to
19 separate the protesters. And the cops stayed
20 across the street and watched that night, and that
21 should have been an indication of what was going to
22 happen the next day. We should have just left at
23 that point. But it didn't really dawn on us
24 that -- the significance of what happened, that the
25 police would stand there and watch and not do their

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jobs, especially after they had been contacted to -- by Kessler to, you know, secure the march where it could take place peacefully.

MS. MUNLEY: Allegra, will you show tab 24. I think this is going to be Exhibit 19.

(Exhibit 19 was marked for identification.)

BY MS. MUNLEY:

Q. Does this look familiar to you?

A. Uh-huh.

Q. Okay. Do you recognize this as a Discord chat?

A. Yes.

Q. And do you recognize your Discord handle, Hunter Wallace?

A. Yes, that's correct.

Q. Okay. And these are posts from September 8th, 2017; is that correct?

A. Yes. This is during what we call the "optics war."

Q. Okay. So the last post, you say, The scariest optics by far to normies was the torchlight. The rally itself was tame by

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2 comparison.

3 Is that correct?

4 A. It looks like I did say that.

5 Q. Okay. What are "normies"?

6 A. People who aren't involved in the
7 movement.

8 Q. And what did you mean that "the optics
9 were scary to normies"?

10 A. Well, I mean, I wasn't watching CNN and
11 stuff, like, when we were doing the torch march.
12 And it was only, like, in hindsight that, you know,
13 I got to go back and, you know, review what was
14 going on on television. I wasn't watching
15 television when I was at the march.

16 It seems like, you know, like, the -- I
17 don't know. Like, that torch march, which -- it
18 seemed like, you know, was -- the reaction to it
19 was hysterical on the 11th. I didn't get to watch
20 the media hysteria until after -- well after the
21 event, though. This was in September, so this was
22 well after (indiscernible).

23 Q. The intention of the torchlight was to
24 be scary; is that correct?

25 A. No, that's not correct. Like I said,

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it was only after the rally that I got to watch,
you know, what CNN and so forth were saying about
the rally.

(Simultaneous speakers.)

BY MS. MUNLEY:

Q. You didn't realize at the time that a
large mass of people, particularly men, dressed in
uniforms, marching with torches would be
frightening to, quote/unquote, normies; is that
correct?

A. Not really. This is a common custom in
Europe, and it used to be an American custom. And
like I said, there was already -- this was the
second torch march. Everyone really liked the
first one. There was -- this was the second one
they did in Charlottesville. The first one they
had done in May and everyone was really impressed
by it.

Q. Is that everyone including,
quote/unquote, normies?

A. Well, my impression was that a lot of
normies, after the May rally, were really -- you
know, I want to get involved in this, I want to go
to -- the response to the first rally was very

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positive, and that was a torchlight rally. And my impression was that the reason that Kessler wanted to hold a second rally was because the first one had been such a success and the normies really liked it. But the second rally, you know, the footage was a lot more hysterical than the one in May, I would say.

Q. But your testimony that the intention of the torchlight rally -- this large mass of men with torches in uniform -- was to play to public opinion and make people like the alt-right; is that correct?

A. Well, the first rally, which was a torch march rally in Charlottesville in May, had a very positive response. In fact, that's why so many people came to Charlottesville, because, you know, they wanted to, you know --

(Simultaneous speakers.)

BY MS. MUNLEY:

Q. You're not answering the question that I asked.

A. I have. Like I said, the first rally, which was a torch march rally, the public response was positive. And that's why there was the second

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2 torch march.

3 Q. And I'm asking you if the intention of
4 the torchlight rally was to appeal to normal people
5 and make people like the alt-right?

6 A. That was the intention, I believe.
7 Yes.

8 Q. All right. And so it's your testimony
9 that the intention of a large group of people in
10 uniform with torches chanting "Jews will not
11 replace us" and "You will not replace us" and
12 "Blood and Soil" was not meant to be menacing to
13 Jewish people and non-white people, correct?

14 A. No. Like I said, torch marches were
15 common in American history, and we were just doing
16 the same thing.

17 Q. Okay. And, in fact, it is your
18 testimony that this large group of people in
19 uniform with torches chanting "Jews will not
20 replace us" and "You will not replace us" and
21 "Blood and Soil" was meant to appeal to the normal
22 American public, correct?

23 A. Half the American publics opposes
24 anarchists, and the majority of people in Virginia
25 support Southern monuments, especially one of the

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founding fathers, so --

(Simultaneous speakers.)

A. Yes, it is. This position that we support the monuments is not a marginal one. Over half the people in Virginia, even after the rally, supported the monuments.

Q. Mr. Griffin, the question that I asked you is: Is it your opinion that a large group of people in uniform with torches chanting "Jews will not replace us" and "You will not replace us" and "Blood and Soil" was meant to appeal to normal people in the American public?

A. Absolutely.

Q. Okay. To your knowledge, was there any ever -- was there ever any discussion amongst the people attending and planning Unite the Right to call off the Saturday events, given what had happened on Friday night?

A. No.

Q. You testified that you think they should have, correct?

A. Well, hindsight is 20/20.

Q. Did the League of the South decide to do anything differently after the events of Friday

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night?

A. No. The League of the South really didn't even participate in the torch march.

Q. But they were aware of it, correct?

A. They were mostly tired from driving so far and went to sleep that night, the vast majority of them.

Q. Did you tell people what happened at the torchlight march?

A. Most of the people were in bed when I got back, and then I was exhausted and -- I had been on the road, you've got to remember, 10, 12 hours just to travel to Virginia, and I barely got any sleep, so I went to bed.

Q. All right. You didn't tell anybody in League of the South what happened during the torchlight march, correct?

A. I remember just passing out when I got back.

Q. And you did stay at the League compound on Friday night, correct?

A. Uh-huh. I was extremely tired after the drive, so when I got back, I went to sleep.

MS. MUNLEY: All right. Let's go

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2 off the record.

3 THE VIDEOGRAPHER: The time is

4 2:55 p.m. We're off the record.

5 (Recess from 2:55 p.m. to

6 3:10 p.m.)

7 THE VIDEOGRAPHER: The time is

8 3:10 p.m. On the record.

9 BY MS. MUNLEY:

10 Q. Mr. Griffin, I just want to clarify one

11 thing from our last exchange. You defined

12 "normies" as the normal American public; is that

13 correct?

14 A. Yeah. It's a slang word that's used,

15 unfortunately, for normal, average, ordinary,

16 everyday people.

17 Q. Okay. And that includes black people;

18 is that correct?

19 A. Yes.

20 Q. Okay. And it includes Jewish people?

21 A. I suppose so.

22 Q. We were talking about torchlight

23 rallies being an American custom. Can you -- are

24 you aware that they were used by the Klu Klux Klan?

25 A. Well, they were used for decades before

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that. Abraham Lincoln had a torch march of a -- a torchlight march at the Republican National Convention, if I'm not mistaken.

Q. Okay. But you are aware that they were used by the KKK, correct?

A. Yes, but they were used for decades before that.

Q. And so it's still your testimony that a torchlight rally, which was used by the KKK, would not be intimidating to black people; is that correct?

A. That's correct. Torchlight marches were used by the Republican party, which abolished slavery. So it was used by both parties in the United States. It was extremely commonplace in (indiscernible) America.

Q. Okay. And it is also your testimony that the chant, "Jews will not replace us" and "Blood and Soil" are not intended to be intimidating to Jewish people; is that correct?

A. "Blood and Soil" is just a reference to ethnonationalism. And "Jews will not replace us" just means that there are Jewish people who oppose our monuments, which is absolutely true.

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2 Q. I think we covered that you are aware
3 that "Blood and Soil" was used by the Nazi party in
4 Nazi Germany; is that correct?

5 A. Most of the nations in the world are
6 based on ethnicity, including --

7 Q. Not the question, Mr. Griffin. I asked
8 you if you were aware that Nazi Germany used the
9 slogan "Blood and Soil"?

10 A. This is Winston Churchill's book, A
11 History of the English-Speaking People --

12 Q. Mr. Griffin --

13 (Simultaneous speakers.)

14 BY MS. MUNLEY:

15 Q. You're here to answer my questions.

16 A. No. I've answered your question.

17 (Simultaneous speakers.)

18 A. Most countries in the world -- most
19 countries in the world are based on ethnicity,
20 including England --

21 (Simultaneous speakers.)

22 BY MS. MUNLEY:

23 Q. I'm asking you about your awareness of
24 the origin of the term "Blood and Soil."

25 A. I don't think that's the origin of the

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term.

Q. Are you aware that it was used in Nazi Germany?

A. Yes. But, like, most countries in the world are based on ethnicity.

Q. (Indiscernible.)

A. Including those that opposed the Nazis.

Q. So you wrote that, when you woke up on August 12th, #Charlottesville was trending globally and the triggering had begun.

What is the "triggering"?

A. Well, I mean, I woke up -- I woke up on the 12th, I checked Twitter, like I normally do in the morning. And it was just, you know, hysteria, you know. I had not seen what had happened on Twitter overnight or the media coverage. I had barely seen that when I passed out and went to sleep. But I was like, Wow, the liberals sure are triggered by the torch march. Oh, my God.

Q. What do you mean by "triggered"?

A. That means that, you know, they were being extremely -- extremely hysterical.

Q. Does it mean that they were upset about it?

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2 A. It means that they were hysterical and
3 acting irrationally, as they commonly do.

4 Q. But why were they hysterical and acting
5 irrationally?

6 A. I can't speculate about anyone's
7 emotional state. I can't read people's mind.
8 These people believe all kind of insane things.

9 Q. I'm just -- I'm not understanding what
10 you mean by "they were hysterical."

11 A. You would think -- you would think --
12 you would think Martians had landed. It was -- it
13 was, you know, just beyond belief, like, you know,
14 hysteria. The only thing I can compare it to is
15 when Orson Welles, you know, had his broadcast that
16 Martians had landed. That was -- I woke up and I
17 was, Oh, my God, the liberal hysteria.

18 Q. So I think where we're disconnecting
19 here is people can have a hysterical reaction to a
20 number of emotions. What emotion was behind their
21 hysteria?

22 A. They were, you know, extremely upset to
23 see that, you know, people would defend -- to
24 actually defend the monuments. I mean, it's
25 hysterical in the fact that most people in Virginia

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support the monuments, even after Charlottesville.
This is what half the public believes. And they're
acting like this is an extremely marginal position
when it's not. Most people would not agree with
vandalizing the statue of Thomas Jefferson, who was
one of our greatest presidents.

And these people -- I mean, why are
there hysterical people tearing down monuments in
Richmond? Why are they tearing down statues of
Christopher Columbus --

(Simultaneous speakers.)

BY MS. MUNLEY:

Q. -- right now. I want to go back to you
said they were hysterically upset about the
torchlight rally.

A. Right.

Q. That's not what you said?

A. I said they were hysterically upset
about the torchlight rally.

Q. Okay. All right. I just want to make
sure that we're understanding each other. So --
and you had expected this. You said, The
triggering had begun. So this was something --

(Simultaneous speakers.)

1 BRADLEY DEAN GRIFFIN

2 BY MS. MUNLEY:

3 Q. My question was: You said the
4 triggering had begun. So this was something that
5 you had expected people would be upset about,
6 correct?

7 A. Well, there's always hysteria on CNN.
8 It's 24/7, so -- I did not expect there to be --
9 that hysterical.

10 Q. But you did expect that people would be
11 upset, correct?

12 A. I expected that, you know, it would be
13 covered, but I did not expect it to be covered to
14 the extent it was. It was -- it seemed to be --
15 get far more publicity than the first torch march
16 in May (unintelligible) --

17 (Simultaneous speakers.)

18 BY MS. MUNLEY:

19 Q. I'm not asking about the amount of
20 media coverage that you had expected for the
21 torchlight rally. I'm asking about the reaction
22 that you had expected. Did you get the reaction
23 that you had been expecting?

24 A. No.

25 Q. Okay. And you -- people were more

1 BRADLEY DEAN GRIFFIN

2 upset about it than you had expected; is that your
3 testimony?

4 A. Yes. Like I said, it was like Martians
5 had invaded or something like that. It was liberal
6 hysteria.

7 Q. And you had not expected people to be
8 upset about it at all; you had expected people to
9 be supportive, correct?

10 A. I expected it would more of a state and
11 local story like the previous rally in May. I did
12 not expect it would be getting, like, global
13 attention. The first rally I don't think got
14 global attention like the second one.

15 Q. So the League of the South assembled at
16 their venue on Saturday morning to go together to
17 Charlottesville for the rally; is that correct?

18 A. Yes.

19 Q. Who did you travel with?

20 A. I think -- I think we went together,
21 the same group who -- who I came with, if I'm not
22 mistaken, in our vehicle.

23 Q. Okay. And your plan was to meet up
24 with the League of the South and other groups in
25 the Nationalist Front in downtown Charlottesville,

1 BRADLEY DEAN GRIFFIN

2 correct?

3 A. We met at a parking lot somewhere north
4 of town, and then, from there, we convoyed to a --
5 the parking garage.

6 Q. Who arranged for the convoy?

7 A. I have no idea.

8 Q. How did you know about the convoy?

9 A. I followed everyone to the parking lot.
10 I forgot the name of the grocery store it was. And
11 then we all followed each other to the parking
12 garage.

13 Q. And what did you bring with you?

14 A. Me personally?

15 Q. Yes.

16 A. A selfie stick and my cell phone.

17 Q. Why did you bring a selfie stick?

18 A. Because I was filming the event.

19 Q. Did you live-stream the event?

20 A. Yes, I did.

21 Q. And was that on Periscope?

22 A. Yes, it was.

23 Q. So what was the purpose of
24 live-streaming the event on Periscope?

25 A. Well, I wanted to broadcast it to my

1 BRADLEY DEAN GRIFFIN

2 social media followers, and I also wanted to, you
3 know, have an account of my own actions that day.

4 Q. Was part of your intent to create a
5 counternarrative?

6 A. I don't know what that means.

7 Q. Okay. You might need to bear with us
8 for this exhibit. It's going to be Exhibit 20.

9 (Exhibit 20 was marked for
10 identification.)

11 BY MS. MUNLEY:

12 Q. So we're going to be playing a few
13 clips of a podcast. Just let me know if you need
14 me to adjust the sound.

15 (Audio played.)

16 BY MS. MUNLEY:

17 Q. Mr. Griffin, do you recognize this
18 podcast?

19 A. (Indiscernible) podcast.

20 Q. That's Harold Crews, correct?

21 A. Yes.

22 Q. And his guest is Michael Hill?

23 A. It seems that way.

24 Q. Okay.

25 (Audio played.)

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2 BY MS. MUNLEY:

3 Q. That was Mr. Michael Hill talking about
4 your role at the Unite the Right rally for League
5 of the South; is that correct?

6 A. That's correct.

7 Q. Okay. And he said that your role was
8 to create a counternarrative and to put a spin on
9 the facts to promote the League of the South's
10 narrative; is that correct?

11 A. Dr. Hill also said I was there to
12 record the truth, which I did.

13 Q. Okay. But is it correct that he said
14 your role was to create a counternarrative and to
15 put a spin on the facts to promote the League of
16 the South's narrative about the day; is that
17 correct?

18 A. That's what he said in the podcast. He
19 also said I was there to report the truth.

20 Q. Okay. So from -- from the time that
21 you got off the convoy and you went downtown, you
22 went to Lee Park; is that correct?

23 A. Yes.

24 Q. Do you know about what time you arrived
25 at Lee Park?

1 BRADLEY DEAN GRIFFIN

2 A. Somewhere around 10 to 11. 10.

3 Q. Okay.

4 A. 10:30, I don't know. Somewhere around
5 that period.

6 Q. How did you get there?

7 A. We stopped in the garage, and everyone
8 was in the garage lined up, and we walked into the
9 park.

10 Q. And by "everyone," you mean every
11 attendee of Unite the Right, or everyone from
12 League of the South?

13 A. Everyone who was in the parking garage,
14 which was a lot of people who were not affiliated
15 with any particular group.

16 Q. Were the convoys for League of the
17 South people or were they for all Unite the Right
18 attendees?

19 A. It was just people who were there. It
20 not all Unite the Right attendees. The alt-right
21 had gathered in, I think, McIntire Park.

22 Q. So I'm sorry. I'm a little confused by
23 your answer.

24 Were the convoys specific to attendees
25 from League of the South or were they open to other

1 BRADLEY DEAN GRIFFIN

2 groups?

3 A. It was just everyone who was -- who
4 wanted to come with us into the rally.

5 Q. Okay.

6 A. Which included people who came by
7 themselves who weren't affiliated with any group.

8 Q. Who was with you when you entered Lee
9 Park?

10 A. I was with my wife and my friends, and
11 we walked into the park.

12 Q. Were you with other League of the South
13 members?

14 A. Yes. I recorded it.

15 Q. Okay. Who specifically were you with?

16 A. My wife and my friend Michael Weaver
17 and Ryan King and Chris and Andrew, who I came
18 with. And in front of us were other League of the
19 South members and various people from -- I had
20 never seen before.

21 Q. Was Michael Tubbs with you?

22 A. He was in the parking garage. I
23 wasn't, like, exactly right near Tubbs. I was with
24 my friends.

25 Q. So you were in the same general group;

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2 is that correct?

3 A. That's correct.

4 Q. Was Michael Hill with you?

5 A. He was at the -- the front. I was,
6 like, way back, like, in the middle or the end of
7 the people who were walking to the park.

8 Q. But, again, the same general group,
9 correct?

10 A. Yeah. We parked right by the --
11 (Simultaneous speakers.)

12 BY MS. MUNLEY:

13 Q. I'm sorry. You parked right by where?

14 A. The police station.

15 Q. About how many League of the South
16 members were with you at that time?

17 A. Well, there were only, like, 50 or 60
18 who came to Charlottesville, and they were all,
19 like, in that group.

20 Q. About how many League of the South
21 members are there total?

22 A. I have -- I'm not in charge of that. I
23 don't know. You would have to ask Dr. Hill.

24 Q. You don't even know a ballpark?

25 A. No, I don't. Most people who join

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2 don't, like, you know, come to rallies and stuff
3 like that.

4 Q. When did you leave Lee Park?

5 A. I left Lee Park when the state of
6 emergency was declared and they ordered us to
7 disperse. And I left with -- I was thinking the
8 rally was relocating to McIntire Park, and I
9 followed the alt-right to McIntire Park.

10 Q. So that's where you went after Lee
11 Park? You walked there; is that correct?

12 A. With my wife and friends, yes.

13 Q. Were there any clear leaders on the
14 ground at Lee Park?

15 A. Inside Lee Park, the atmosphere was
16 cordial. Everybody was preparing for the rally. I
17 saw David Duke was there. He was in high spirits.
18 I saw Mike Enoch was there. He was in high
19 spirits. There was one counterprotester inside Lee
20 Park who was handing out water bottles. And he
21 told me that he wasn't with the antifa, he was just
22 there to oppose violence. And so I took a water
23 bottle from him and gave him a hug and said, I
24 oppose violence too. There were counter-protesters
25 even in the park, but everyone was fine.

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2 Q. Did anybody seem to be in charge in the
3 park?

4 A. Everyone seemed to be just doing two
5 things -- well, three things: socializing, waiting
6 for the event to start, or -- you know, there was a
7 group of guys who were keeping the anarchists from
8 charging up the steps and attacking people.

9 Q. Did you communicate with Michael Hill
10 at all on August 12th?

11 A. I believe I saw him afterwards, but,
12 like, in the midst of the chaos in the park, not
13 really. But I recorded that.

14 Q. Did you communicate with Michael Tubbs
15 at all while you were -- during the rally?

16 A. Tubbs was too busy trying to rescue
17 people who were getting beaten by the anarchists
18 who were coming in late by themselves.

19 Q. Did you communicate with Ike Baker at
20 all during the rally?

21 A. I saw Ike on the way out of the rally,
22 and it looked like his knee had gone out, and he
23 was waiting for someone to pick him up.

24 Q. Did you communicate with any other
25 members of League of the South during the rally?

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A. I was mostly going around socializing with the alt-right people who were there. And I left -- in fact, I got separated from my group. I went to McIntire Park, where the alt-right was. And I had to catch a ride back to the parking garage. But I didn't go out of the park with League of the South; I went out of the park with the alt-right.

Q. Okay. And were you -- were you communicating about the rally on any other social media platforms during the rally besides Periscope?

A. I don't think so. My battery died on the way out.

Q. Do you know who James Fields is?

A. Do I know who James Fields is? Yeah. Everyone knows who James Fields is now. I didn't know him at the time.

Q. Did you know who he was prior to the rally?

A. Did I what?

Q. Did you know who he was prior to the rally?

A. No. The first time I ever heard of James Fields was after the event was over when they

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said there was a car crash. And then he was identified, and no one knew him. It wasn't until his trial that we found out anything about him at all. We didn't know him at all.

Q. Have you ever spoken to him?

A. No, I have not.

Q. Have you ever communicated with him in any other way?

A. No, I have not.

Q. Are you aware that he was a member of Vanguard America?

A. No, I was not. I saw that he was (indiscernible). I think he had a Vanguard America shield. But he was not someone known to me. He was not anyone I recognized. He wasn't with my group.

Q. Are you aware that he marched with Vanguard America members at the rally?

A. I've seen the photos, but I don't think he -- I don't know if they even knew him. But that group kind of disappeared after, you know, Charlottesville.

Q. And James Fields murdered Heather Heyer by driving his car into a crowd with his vehicle;

1 BRADLEY DEAN GRIFFIN

2 is that correct?

3 A. I've seen, over the last two weeks, at
4 least 24 similar incidents to what happened with
5 James Fields, so I don't -- I don't think so.

6 Q. You don't think he murdered Heather
7 Heyer?

8 A. I've seen 24 similar car crashes
9 involving antifa in the streets in the last two
10 weeks, so that is -- raised my doubts. I think he
11 just got caught at the wrong place at the wrong
12 time, just like all the other 24 people I've seen
13 over the past two weeks.

14 Q. So you don't believe he drove into a
15 crowd of protesters on August 12th; is that
16 correct?

17 A. I knew nothing about James Fields until
18 his trial, and I watched his trial. And I didn't
19 know until his trial that he had set his GPS to
20 return home to Ohio. So I don't see why he had his
21 GPS on to return to Ohio if he intended to murder
22 anyone. I think he just got caught in an antifa
23 mob like all the other people we've seen over the
24 last two weeks.

25 Q. And did that result in Heather Heyer's

1 BRADLEY DEAN GRIFFIN

2 death?

3 A. Yes, it did. That's tragic.

4 Q. You still claim that Heather Heyer
5 actually died of a heart attack and not the car
6 attack?

7 A. No. There was a period of confusion
8 that stemmed from an interview her mother gave.
9 And Michael Edison Hayden called me from Newsweek
10 and told me that -- you know, we couldn't find
11 Heather Heyer in the video footage for a while.
12 But after the autopsy come out, I said, you know,
13 that she had been hit by the car.

14 Q. Do you know DeAndre Harris?

15 A. I've only heard of him after the event,
16 but, of course, I know who DeAndre is.

17 (Technical discussion off the
18 record.)

19 BY MS. MUNLEY:

20 Q. And is it your understanding that
21 DeAndre Harris was attacked by a group of Unite the
22 Right attendees?

23 A. No, that's not my understanding.

24 Q. What is your understanding?

25 A. DeAndre Harris and his friends

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(indiscernible) pursued League of the South protesters as they were returning to their vehicles. He approached my friend Harold Crews, he grabbed his Confederate flag and tried to steal it, like he had done with another person earlier that day. He spun Harold around, and he hit Harold across the head with a Maglite and hurt him really bad. In fact, I talked to Harold after the event was over. He was very injured and upset. One of the nicest Southern gentlemen I have ever met in my life. He would never harm anyone like that.

Q. Mr. Griffin, are you -- are you reading from a document?

A. No, I'm not.

(Simultaneous speakers.)

A. I've seen that video so many times, you know, I can recount from memory. So, yeah, I've written about it many times.

Q. So you've seen video of the attack, correct?

A. Yes. In fact, I found the video of DeAndre Harris sneaking up behind Harold and spinning him around and hitting him across the head with a Maglite in front of police officers who let

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it happen. And it was one of the most disgraceful things I've ever seen in my life. And what's happened since then by these very same people disgusts me. And I am no bit surprised. Because what happened in Charlottesville has happened all over this country in the last few weeks.

Q. All right. Mr. Griffin, I'm going to cut you off.

When did you first hear about the incident with DeAndre Harris?

A. It was after I got back. I think it was at the -- at the -- the hippie compound or whatever, the new-age place where I saw Harold, and he was bleeding from his forehead.

Q. So Harold Crews is the person who told you about the incident; is that correct?

A. Yes. I believe it was Harold who told me. I was outraged by it.

Q. There were League of the South members involved in this incident besides Harold Crews; is that correct?

A. Yes. There were -- there were people who weren't even part of our group. They saw these people attack a man and try to steal his property

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and hit him in the side of the head with a flashlight while cops looked on. And that caused a melee. It's extremely sad that, you know -- what happened -- the most outrageous thing about it is that the video was deliberately edited, and it was broadcast all over the media. But they left out the part where Corey Long and DeAndre Harris approached Harold, tried to steal his flag, and hit him over the head with a Maglite.

Q. Okay. So in addition to Harold Crews, Michael Tubbs was involved in this incident; is that correct?

A. I don't recall -- I don't recall Tubbs getting physically involved. I think I saw it -- I've seen the video. But Harold is a nice man. He is an elderly man. And elderly people were being attacked by thugs in front of the Charlottesville Police Department while they watched.

Q. I don't need your editorializing on this incident. I've just got a couple more questions. We're trying to get through this. Okay?

A. That's the facts.

Q. What I'm asking is: Was Michael Tubbs

1 BRADLEY DEAN GRIFFIN

2 present during this incident?

3 A. I wasn't there at the time. I was in
4 McIntire Park.

5 Q. All right. When did this incident
6 occur, roughly?

7 A. After the event was over, the League of
8 the South -- the event was canceled, and they
9 returned to the parking garage to leave and go back
10 to the place we were staying at north of town.
11 They were returning to their vehicles in the
12 parking garage.

13 MS. MUNLEY: Allegra, will you
14 show tab 90. I think it's going to be
15 Exhibit 21.

16 (Exhibit 21 was marked for
17 identification.)

18 BY MS. MUNLEY:

19 Q. Mr. Griffin, can you see this photo?

20 A. Yes, I can see that photo.

21 Q. Do you recognize this as a photograph
22 of the incident that we're discussing?

23 A. Yes.

24 Q. The man who is circled there, is that
25 Mr. Tubbs?

1 BRADLEY DEAN GRIFFIN

2 A. It looks like him. I can't really
3 tell, though.

4 Q. Do you recognize anybody else in this
5 photo?

6 A. I believe that's Daniel Borden, who is
7 currently in jail.

8 Q. And I apologize. Can you describe who
9 you're speaking about?

10 A. I think that's the guy on the right,
11 the one who went to jail.

12 Q. The white helmet.

13 (Simultaneous speakers.)

14 A. Can I what?

15 Q. I'm sorry. I'm asking Allegra to
16 circle that person to make sure we're talking about
17 the same person.

18 This person is Daniel Borden?

19 A. I believe so. I believe he's one of
20 the ones in jail.

21 Q. And do you recognize anybody else in
22 this photo?

23 A. No, I don't.

24 Q. The person to the left, all the way on
25 the left, holding -- I can't tell what. Can you

1 BRADLEY DEAN GRIFFIN

2 identify what he's holding?

3 A. It looks like a flag upside down.

4 Q. And the person on the far right -- who
5 is holding what appears to be a shield; is that
6 correct?

7 A. Yes.

8 Q. And they are using those items as
9 weapons here; is that correct?

10 A. It appears that way. Is that DeAndre?

11 Q. On the ground?

12 A. Yeah.

13 Q. I would assume so.

14 A. Yes. This was the scuffle after he had
15 attacked Harold with the Maglite.

16 MS. MUNLEY: Allegra, you can
17 take this down.

18 BY MS. MUNLEY:

19 Q. Tyler Davis was also involved in this
20 incident; is that correct?

21 A. He's been charged with it, but I wasn't
22 there to personally witness it.

23 (Simultaneous speakers.)

24 BY MS. MUNLEY:

25 Q. Did you know Tyler Davis before Unite

1 BRADLEY DEAN GRIFFIN

2 the Right?

3 A. I met him before in Florida.

4 Q. Were you friendly?

5 A. I would suppose so. I only briefly met
6 him and shook his hand.

7 Q. Were you with him during the Unite the
8 Right rally?

9 A. No, I was not.

10 Q. Did you see him on that day?

11 A. I believe so.

12 Q. And you believe he was staying at the
13 same venue as you were, correct?

14 A. I think so. I'm not exactly sure.

15 Q. Four individuals -- Tyler Davis, Jacob
16 Goodwin, Daniel Borden, and Alex Ramos -- were
17 charged with malicious wounding as a result of this
18 incident, correct?

19 A. Yes.

20 Q. And all four of them are serving time
21 in prison, correct?

22 A. Last I checked.

23 Q. Did you know Jacob Goodwin before Unite
24 the Right?

25 A. No, I did not.

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2 Q. Do you know Daniel Borden?

3 A. No, I do not. I've only seen him in
4 the media. He wasn't with my group.

5 Q. And do you know Alex Ramos?

6 A. I especially don't know that guy.
7 That's an Hispanic guy from Atlanta, if I'm
8 mistaken -- not mistaken.

9 Q. Are any of them League of the South
10 members?

11 A. No. Davis -- Tyler Davis was a League
12 of the South member.

13 MS. MUNLEY: Okay. Allegra, I'm
14 going to ask you to put tab 24 back up.
15 I know we've used this as an exhibit
16 already, and I don't know what the
17 number was.

18 BY MS. MUNLEY:

19 Q. We're getting really close,
20 Mr. Griffin, I promise.

21 A. My son has been quiet so far.

22 Q. He's doing really well.

23 All right. I think we identified these
24 earlier as posts you made on Discord in September
25 of 2017; is that correct?

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2 A. That's correct.

3 Q. And at that point, you wrote, The
4 optics were fine. We projected strength and unity.
5 Could have done without the one swastika flag, but
6 the overall image of the event was defined by the
7 polos/khakis; is that correct?

8 A. Yes.

9 Q. And that was your opinion of the Unite
10 the Right rally in September 2017; is that correct?

11 A. This was during what's called the
12 optics war, which was a fiasco.

13 Q. Can you explain that?

14 A. After the Unite the Right rally, the
15 alt-right began arguing over the optics of the
16 event, and that went on for months into 2018. But
17 that's what that's in reference to.

18 Q. Okay. And you were on the side of the
19 optics being positive from the Unite the Right
20 rally; is that correct?

21 A. I felt the optics argument was
22 seriously, seriously, like, overblown.

23 Q. All right. But here you say, The
24 optics were fine, correct?

25 A. I mean, in terms of what we intended to

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do, yes. There was one individual who showed up with a swastika flag who no one knew, and we never found out who that guy was. He was never doxed. Everyone agreed that that guy, you know, was an embarrassment. And -- but I think, you know, when we were attacked by anarchists in the park, I felt, you know, we were doing the right thing. I think we looked good.

Q. Mr. Griffin, what was the -- what would you say the normies' reaction to the Unite the Right rally was?

A. A lot of people were inspired by it, because they had been looking for people to defend the monuments and to stand up for their rights. And, of course, there was a lot of infighting and hysteria afterwards. These posts are in reference to the infighting that was after the event.

Q. The infighting amongst who?

A. Everyone who went to the rally who had this -- this debate over optics that went on for, like, six months.

Q. So you're not expressing an opinion here that the optics of Unite the Right were overall positive in the American public; is that

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correct?

A. In hindsight, I think, you know, the optics are better than, you know, they were made out to be at the time. The anarchists who attacked us that day have gone down to burn down the entire country, so -- and tear down all these monuments, so, you know, I think it was the right thing to support the Lee monument, although I didn't count on the police standing down that day. And I wouldn't do it again.

Q. And you would call the whole Unite the Right overall a success; is that correct?

A. No. We were -- we entrusted our security to the police, and that was a mistake, and it was a mistake we learned from.

Q. So you are saying that the reason that Unite the Right was a failure was not because a woman was murdered, it was because you entrusted your security to the police; is that correct?

A. The reason Unite the Right was a failure, as was determined in the Heaphy report, is that the police barricaded themselves and watched on while a city descended to anarchy. And for over two hours after the event, antifa was parading

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through the streets attacking people leaving the event and just bystanders. When you allow your city to descend into lawlessness like that, that's why, you know, it was a failure. We should not -- we don't need to be associated with those kind of optics, like the kind we're seeing, you know, the anarchists do all over the country now.

Q. League of the South disassociated itself from the Nationalist Front after Unite the Right; is that correct?

A. I believe in 2018.

Q. Do you know why?

A. Well, it was never really an -- it was never really, you know, an ideal match in the first place. And we decided to deal with the flash model of holding activism. So we didn't even want to be in the same area as violent anarchists. So we didn't -- at that point, you know, we decided to, you know, change tactics.

MS. MUNLEY: Okay. We're going to take maybe five minutes to make sure we're done here. And then, Brian, we can turn it over to you. We can go off the record right now.

BRADLEY DEAN GRIFFIN

THE VIDEOGRAPHER: The time is
3:50 p.m. We're off the record.

(Recess from 3:50 p.m. to
3:57 p.m.)

THE VIDEOGRAPHER: The time is
3:57 p.m. We're on the record.

BY MS. MUNLEY:

Q. Mr. Griffin, have you consulted any
documents during this deposition today?

A. No.

Q. Have you spoken to anybody about the
subject matter of this deposition during the
deposition today?

A. I briefly talked to my lawyer.

MS. MUNLEY: Okay. All
right. No more questions from me.
Mr. Jones, do you have any cross?

MR. JONES: I don't have any
questions.

MS. MUNLEY: Okay. All
right. Mr. Griffin, thank you so much
for your time. And I just want to put
on the record that we are going to do
the standard stipulations.

1 BRADLEY DEAN GRIFFIN

2 MR. CAMPBELL: No questions.

3 Dave Campbell. Thanks. Have a good
4 one.

5 THE VIDEOGRAPHER: 3:58 p.m.

6 We're off the record.

7 (The deposition of BRADLEY DEAN

8 GRIFFIN concluded at 3:58 p.m.)

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BRADLEY DEAN GRIFFIN

REPORTER'S CERTIFICATE

I, Greta H. Duckett, Certified Court
Reporter, Registered Professional Reporter, and
Certified Realtime Reporter, hereby certify that on
Thursday, June 11, 2020, I reported the deposition
of BRADLEY DEAN GRIFFIN, who was first duly sworn
or affirmed to speak the truth in the matter of the
foregoing cause, and that the pages herein contain
a true and accurate transcription of the
examination of said witness by counsel for the
parties set out herein.

I further certify that I am neither of kin
nor of counsel to any of the parties to said cause,
nor in any manner interested in the results
thereof.

This 17th day of June, 2020.



GRETA H. DUCKETT, RPR, CRR, CVR-S, RVR-M-S
ACCR-12, GCCR-2891, MCCR-1945, TNLCR-671
Commissioner, State of Alabama at Large
CCR EXPIRATION: 9/30/20
MY COMMISSION EXPIRES: 5/17/21

ERRATA SHEET

Case Name:

Deposition Date:

Deponent:

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Signature of Deponent

SUBSCRIBED AND SWORN BEFORE ME
THIS ____ DAY OF _____, 2020.

(Notary Public) MY COMMISSION EXPIRES: _____